

Enclosure 1 of ACO 20-0028

Description of Change and Justification for the Supplemental Proposed Changes

**Information Contained Within
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Reviewing

Official: _____ #1014 _____

Date: _____ 09/02/2020 _____

Detailed Description and Justification

On March 31, 2020 (ACO 20-0009), American Centrifuge Operating, LLC's (ACO) submitted the initial License Amendment Request for ACO's Piketon Security Plan(s). ACO 20-0009 provided a detailed description, justification, and ACO's significance determination for the proposed new and changed documents as follows:

- New SP-3605-0041, *Security Plan for the Protection of Classified Matter at the American Centrifuge Plant*
- New SP-3605-0018, *High Assay Low Enriched Uranium (HALEU) Cascade Engineering, Procurement, and Construction (EPC) Temporary Security Plan*
- New SP-3605-0039, *American Centrifuge Classified Cyber System Security Plan (SSP)*
- Revised SEC-18-0002, *American Centrifuge Operating, LLC (ACO) – Cyber System Security Plan (SSP)*
- Revised 331-06-161, *American Centrifuge Program – Operations Security Plan*

Proposed changes were determined not to decrease the effectiveness of the Security Programs/Plans in accordance with 10 *Code of Federal Regulations* (CFR) 70.32; however, the new security plans were determined to be a substantive change in accordance with 10 CFR 95.19 and required U.S. Nuclear Regulatory Commission's (NRC) prior review and approval.

On April 29, 2020, staff from the NRC, U.S. Department of Energy (DOE), and ACO held a conference call to discuss questions related to ACO's submittal dated March 31, 2020 (ACO 20-0009). On July 16, 2020 (ACO 20-0019), ACO submitted responses to NRC staff comments specifically related to SP-3605-0041.

On June 23, 2020, NRC, DOE, and ACO staff held a conference call to discuss questions related to SEC-18-0002, also submitted on March 31, 2020 (ACO 20-0009). On July 16, 2020 (ACO 20-0019), ACO submitted responses to NRC staff comments specifically related to SEC-18-0002.

On June 30, 2020, during a NRC and DOE on-site inspection, discussions were held regarding SP-3605-0018 and SP-3605-0039. On July 16, 2020 (ACO 20-0019), ACO submitted proposed changes addressing those on-site discussion.

During August 2020, ACO performed an internal readiness assessment in preparation for the NRC's planned operational readiness review for Piketon, Ohio set for the week of September 14, 2020. During this assessment, findings and observations were made which compelled changes to the following plans: SP-3605-0041, SP-3605-0018, and SP-3605-0039. Proposed changes have been reviewed and determined not to decrease the effectiveness of the Security Programs/Plans in accordance with 10 CFR 70.32; however, are being re-submitted in support of the upcoming NRC operational readiness review. The detailed description, justification, and ACO's significance determination provided by ACO 20-0009 remains unchanged with these supplemental proposed changes.

The proposed changes to the enclosed security plans are identified by the following method:

- ~~Blue Strikeout~~ - Identifies text to be removed
- Red underline – Identifies text to be added