



October 16, 2020
ACO 20-0037

ATTN: Document Control Desk
Ms. Sabrina D. Atack, Director
Division of Security Operations
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

American Centrifuge Lead Cascade Facility and American Centrifuge Plant
Docket Numbers 70-7003 and 70-7004
License Numbers SNM-7003 and SNM-2011

**Supplemental Proposed Changes for American Centrifuge Operating, LLC's Security Plans -
EPID #L-2020-SPR-0003**

**INFORMATION TRANSMITTED HEREWITH IS PROTECTED FROM PUBLIC
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AND
INFORMATION TRANSMITTED HEREWITH IS PROTECTED FROM
DISCLOSURE PURSUANT TO 10 CFR PART 810**

Dear Ms. Atack:

The purpose of this letter is to provide supplemental proposed changes to the U.S. Nuclear Regulatory Commission (NRC) for review and approval for the American Centrifuge Operating, LLC (ACO) security plans.

Enclosure 1 provides the description of change and justification for the supplemental proposed changes for the following security plans:

- SP-3605-0041, *Security Plan for the Protection of Classified Matter at the American Centrifuge Plant (Enclosure 2)*
- SP-3605-0018, *High Assay Low Enriched Uranium (HALEU) Cascade Engineering, Procurement, and Construction (EPC) Temporary Security Plan (Enclosure 3)*
- 331-06-161, *American Centrifuge Program Operations Security Plan (Enclosure 4)*

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Supplemental proposed changes from the previously submitted plans are noted with revision bars in the right-hand margin.

Enclosures 2 through 4 contain Security-Related Information and, in accordance with the guidance provided by the U.S. Department of Energy (DOE), contain Official Use Only information. Therefore, ACO requests these enclosures be withheld from public disclosure pursuant to 10 CFR 2.390(d)(1). Additionally, Enclosures 2 and 3 have been determined, in accordance with the guidance provided by the DOE, to contain Export Controlled Information and must be protected from disclosure per the requirements of 10 CFR Part 810.

If you have any questions regarding this matter, please contact me at (740) 897-3859.

Sincerely,



Kelly L. Wiehle
Regulatory Manager

cc (without enclosures, unless otherwise noted):

B. Brown, NE-OR1, NE-ORSO
K. Everly, NRC HQ (Enclosures)
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S. Greene, NE-32, NE (Enclosures)
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N. Pitoniak, NRC Region II (Enclosures)
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E. St. Clair, DOE ORO
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T. Vukovinsky, NRC Region II (Enclosures)

Enclosure 1 of ACO 20-0037

Description of Change and Justification for the Supplemental Proposed Changes

**Information Contained Within
Does Not Contain
Export Controlled Information**

Reviewing

Official: _____ #1014 _____

Date: _____ 10/13/2020 _____

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, as submitted on September 3, 2020 (ACO 20-0028). On September 10, 2020 (ACO 20-0033), ACO provided proposed changes to SEC-18-0002 which compelled an additional change to Figure 1 of SP-3605-0039.

During the operational readiness review held in Piketon, Ohio on September 15-17, 2020, the NRC reviewed the license amendment request and supplemental changes as discussed above. Clarifications within SP-3605-0041, SP-3605-0018, and 331-06-131 were requested during this inspection and are being resubmitted as enclosures of this letter.

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 NRC's final approval of the license amendment request. 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:

-  - Identifies text to be removed
- Red underline - Identifies text to be added