



11/19/2020  
FS-20-0132-1

David Skeen, Deputy Director  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

**Subject: Supplement to Orano October 2, 2020 Export License Application**

Dear Deputy Director Skeen,

Orano Federal Services LLC  
4747 Bethesda Avenue  
Suite 1001  
Bethesda, MD 20814  
Tel: +1 (301) 841-1732

On October 2, 2020, Orano Federal Services LLC (Orano) submitted an application to the U.S. Nuclear Regulatory Commission (NRC) to export fuel fabrication equipment from the United States to Orano Cycle's Establishment de Melox (Melox) in France (the Application). Following discussions with the NRC staff, Orano is providing this supplement to the Application to offer more information about the planned export and to assist the NRC and Executive Branch in their review.

***\*\*\*Due to pressing business and U.S. federal government needs, Orano requests that the NRC complete action and issue the requested export license by 04/15/2021.\*\*\****

**I. Additional Information on the Equipment to be Exported**

**Box 10 (Description of Equipment)** – The equipment to be exported and described in Box 10 of the Application (Equipment) consists of excess fuel fabrication equipment from the cancelled Mixed oxide (MOX) Fuel Fabrication Facility (MFFF) to be constructed at the U.S. Department of Energy (DOE) Savannah River Site near Aiken, South Carolina. It would be shipped to Melox in France to assist with MOX fuel fabrication there, serving as spare parts for the facilities already in operation.

Although the Equipment may be used for MOX fuel fabrication once at Melox, this export does not transfer any new capability to France in the area of MOX fuel fabrication, and does not otherwise raise national security or proliferation concerns:

- This Equipment is identical to traditional uranium fuel fabrication equipment, and is not specially designed for MOX fuel fabrication. This Equipment would be used for spare parts for Melox only, and does not require specialized technology compared to traditional uranium fuel fabrication.
- This Equipment is already based on French-origin technology, and the detailed designs of the Equipment are already in French possession. In fact, Orano was an indirect 30% participant in the US MFFF project, and the MOX fuel technology to be used at the MFFF was based on French-origin technology already in use at Melox.



- This Equipment will serve as spare parts for fuel fabrication lines already in operation at Melox, and will not otherwise enhance Melox's MOX fuel capabilities.

**Box 16 (Foreign Obligations)** – Except for the item listed below, all of the Equipment listed in the Application was manufactured in the United States:

- **Item #8, Sieving Machine (Forced Sieve MF3) – FreNuc SA, Route du Coteau, 7 Granges Paccot, CH1763 Switzerland**

There are no foreign obligations on the Equipment that we are aware of that would impact their use at Melox. Their end use remains the same (MOX fuel fabrication), just the location of use (France versus United States) is different.

## **II. Additional Information on Shipment Plan**

**Boxes 4-5 (Shipment Dates)** – The exact dates of the shipment will depend on the timing of NRC's issuance of the export license. Presuming the Application is approved by the requested date of 04/15/2021, then the shipment dates would be approximately:

- Anticipated First Shipment Date: 06/15/2021
- Anticipated Last Shipment Date: 09/15/2021

**Box 6 (Proposed Expiration Date)** – The shipment or shipments are anticipated to occur in short order upon issuance of the export license. We understand from discussions with the NRC staff that a five-year license term is standard for this type of license, and thus the expected license expiration date would be 5 years from the date of submission of the Application, or October 2, 2025.

**Box 7 (U.S. Suppliers/Parties to Export)** – The information provided in Box 7 of the Application pertains to the corporate address for Orano Federal Services LLC, the ultimate U.S. exporting party. To provide further detail as to the planned shipment:

- The Equipment is currently owned by DOE and located as the DOE Savannah River Site near Aiken, South Carolina. DOE will sell the Equipment to Orano before its export to Melox, approximately around April-July 2021.
- After the sale of the Equipment to Orano, it will be transferred to the custody of Orano TN, an Orano affiliate, who will prepare the Equipment for shipment prior to export. The address where the Equipment will be held is Orano TN Americas, 357 Woodward Drive, Aiken, SC 29803, USA.
- At the time of the export, the Equipment will be shipped directly from the Orano TN facility (USA) to Orano Cycle – Etablissement de Melox (France) in Lieu-dit La Tourette, CHUSCLAN 30200.



### **III. Request for Expedited Review**

As stated above, Orano requests NRC issuance of the export license by 04/15/2021. First, DOE needs to move the Equipment from the former MFFF site as soon as possible to facilitate its work to repurpose the MFFF site for other national security purposes. Second, the Equipment should arrive at Melox by September 2021 to smoothly fit into Melox's facility operations.

\* \* \*

Should you have any questions or comments concerning this supplement or the earlier Application, please do not hesitate to contact our General Counsel, Mike Woods at (202) 748-3673/Michael.woods@orano.group.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Rousseau".

Gilles Rousseau  
Senior Vice President / COO  
Orano Federal Services LLC

Cc: Barry Miller, U.S. Nuclear Regulatory Commission  
Mike Woods, Orano USA LLC  
Amy Roma, Hogan Lovells US LLP  
Sachin Desai, Hogan Lovells US LLP