

LES-21-077-NRC

July 13, 2021



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

Louisiana Energy Services, LLC  
NRC Docket Number: 70-3103

**Subject:** Revised License Amendment Request, Quality Program Requirements for Redundant IROFS (LAR-20-01)

**References:**

- 1) LES-20-00074-NRC, License Amendment Request revising Quality Program Requirements for Redundant IROFS (LAR-20-01) dated Sept 8, 2020.
- 2) Request for Additional Information Regarding Quality Program Requirements for Redundant IROFS dated January 22, 2021.
- 3) LES-21-022-NRC, Response to LAR 20-01 RAI Regarding Quality Program Requirements for Redundant IROFS, dated February 12, 2021.
- 4) NRC Conference Call Summary between NRC and LES Regarding Redundant IROS Amendment Application, dated March 30, 2021
- 5) NRC Discussion and Option notes for virtual meeting held on May 17, 2021.
- 6) Email from Kevin Ramsey, NRC to Wyatt Padgett, Urenco USA, UUSA LAR-20-01, QL-2R (Redundant IROFS), June 3, 2021
- 7) Email from Wyatt Padgett, Urenco USA, to Kevin Ramsey, NRC, QL-2R (Redundant IROFS), June 8<sup>th</sup>, 2021.
- 8) Email from Kevin Ramsey, NRC to Wyatt Padgett, Urenco USA, UUSA LAR-20-01, QL-2R (Redundant IROFS), June 30, 2021

In Reference 1, Louisiana Energy Services (LES), dba URENCO USA (UUSA), proposed a License Amendment Request (LAR) to revise the Quality Assurance Program Description and Safety Analysis Report to incorporate a new class of IROFS and a new quality program for such IROFS. In Reference 2, the U.S. Nuclear Regulatory Commission (NRC) responded with a request for additional information (RAI) for which UUSA responded in Reference 3. Since submittal of Reference 3, 2 meetings, Reference 4 and 5, have been held discussing additional concerns the NRC has regarding the license amendment request. Additionally UUSA responded to Reference 6 in Reference 7 recommending we respond formally where NRC concurred in Reference 8.

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Enclosure 1 contains detailed explanations to the concerns raised in References 5, 6 and 7. Enclosure 2 provides revised change pages to the Amendment Request. Enclosure 3 provides a copy of UUSA's Boundary Document Definition Procedure.

Enclosure 4 provides an affidavit. UUSA considers the information provided in Enclosure 1 as Sensitive Unclassified Non-Safeguards Information (SUNSI), and requests that the information be withheld from public disclosure in accordance with 10 Code of Federal Regulations 2.390 and the guidance described in Regulatory Information Summary 2005-31, Attachment 2, Appendix 1. UUSA considers Enclosure 3 to be commercial in confidence.

Should there be any further questions concerning this submittal, please contact Wyatt Padgett, Licensing and Performance Assessment Manager at 575.394.5257.

Respectfully,



Digitally signed by P.  
Paul Lorskulsint  
Date: 2021.07.13  
15:59:57 -06'00'

Paul Lorskulsint  
Chief Nuclear Officer

Enclosures:   1) Explanations to additional NRC concerns on QL-2R  
                  2) Revised Page Changes to the Licensing Basis Documents for LAR-20-01  
                  3) EG-3-3100-02, IROFS Boundary Definitions, Revision 5  
                  4) Affidavit

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CC:

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**ENCLOSURE 4**

**Affidavit**

I, Paul Lorskulsint, being duly sworn, state that I am the Chief Nuclear Officer for Louisiana Energy Services (LES), dba URENCO USA (UUSA); that I am authorized on the part of said company to sign and file with the Nuclear Regulatory Commission ("NRC") this document; and that all statements made and matters set forth herein are true and correct to the best of my knowledge, information, and belief:

1. LES wishes to have withheld from public disclosure the following document:  
  - LES-21-077-NRC Enclosure 1, Explanations to additional NRC concerns on QL-2R
  - LES-21-077-NRC Enclosure 3, EG-3-3100-02, IROFS Boundary Definitions, Revision 5.
2. The information contained in the documents cited above for which exemption from public disclosure is requested is 1) proprietary information related to commercial aspects of the URENCO USA Facility and 2) security related information. LES requests that the proprietary and Sensitive Unclassified Non-Safeguards Information (SUNSI) be exempt from disclosure pursuant to the provisions in 10 CFR Part 2.390(a)(4).
3. Public disclosure of the information in the above enclosure to this submittal has the potential to result in substantial harm to the competitive position of LES, provide valuable business information to competitors of LES which they could duplicate without having to expend their own resources to develop, and reduce or foreclose the availability of profit opportunities.
4. The information stated in this affidavit has been submitted in accordance with the applicable parts of 10 CFR 2.390, the guidance contained in NUREG-1556, Vol. 20, Appendix C.4 and the guidance from NRC RIS-2005-31, Attachment 2, Appendix 1 (Fuel Cycle Facility Reviews).
5. The information sought to be withheld is not in the public domain, to the best of LES's knowledge and belief.



Paul Lorskulsint  
Chief Nuclear Officer  
Louisiana Energy Services, LLC

07/13/21

Date

I certify the above named person appeared before me and executed this document on this 13<sup>th</sup> day of July 2021.



Notary Public  
My commission expires: June 16, 2024



OFFICIAL SEAL  
Verónica Romero  
NOTARY PUBLIC  
STATE OF NEW MEXICO  
My Commission Expires June 16, 2024

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**ENCLOSURE 2**

**Revised page changes to the Licensing Basis Documents:  
UUSA, Quality Assurance Program Description  
(Redline strikethroughs were utilized)**

## **SECTION 24 QUALITY ASSURANCE PROGRAM FOR QUALITY LEVEL 2R**

This section outlines the requirements for the QL-2R Program. This section applies only to QL-2R components. The QL-2R Program is based upon the following:

Management measures will be identified for QL-2R components in accordance with UUSA procedures. QL-2R applies to the Redundant Administrative Control IROFS Other Equipment identified in Table 3.4-1 of the Safety Analysis Report.

### **SECTION 24.1 ORGANIZATION**

The organization, lines of responsibility and authority are established and documented.

### **SECTION 24.2 QUALITY ASSURANCE PROGRAM**

The program will provide for indoctrination and training, as necessary, of personnel performing activities affecting quality to assure that suitable proficiency is achieved and maintained

LES will assess the adequacy of that part of the program for which QL-2R applies to assure its effective implementation.

### **SECTION 24.3 DESIGN CONTROL, DESIGN DOCUMENTATION AND RECORDS**

QL-2R component design requirements will be in accordance with UUSA requirements for QL-3 designs. QL-3 design requirements are described in Engineering Department procedures.

### **SECTION 24.4 PROCUREMENT**

QL-2R procurements shall be conducted in accordance with the UUSA requirements for QL-3 procurements. The QL-3 procurement process is described in Procurement Department procedures. The process includes requirements for: formal interfaces between UUSA and the supplier, identification of specific terms and conditions, procurement planning, complete and accurate description of needs, reviews and approvals by knowledgeable and responsible individuals, technical and quality requirements, verification of technical adequacy and completeness, design review, change review and approval, identification of deviations by suppliers, methods of acceptance, procurement package closure and documentation.

### **SECTION 24.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS**

Activities affecting quality shall be prescribed by and conducted in accordance with approved procedures and other implementing documents (drawings, specifications, etc.) appropriate to the circumstances and to the level of detail necessary. Work activities are performed in accordance with written procedures. Procedures will contain the actions, acceptance criteria and method for evaluation to ensure prescribed activities have been satisfactorily accomplished.

### **SECTION 24.6 DOCUMENT CONTROL**

Documents that furnish documentary evidence of quality of critical elements are specified, prepared, and maintained. Documents will be legible, identifiable, and retrievable. Documents are protected against damage, deterioration, and loss. Requirements and responsibilities for document transmittal, distribution, retention, maintenance, and disposition are established. Requirements for the identification, generation, and control of Quality Assurance Documents for the QL-2R components will be in accordance with the requirements of Section 6 of the QAPD.

### **SECTION 24.7 CONTROL OF PURCHASED MATERIAL EQUIPMENT AND SERVICES**

Measures are established to ensure conformance with procurement specifications and documents

LES will define critical elements applicable to the components and material

### **SECTION 24.8 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS**

The controls necessary to ensure that only correct and accepted items are used or installed will be required and specified in implementing procedures, including requirements for identification of materials, parts and components.

### **SECTION 24.9 CONTROL OF SPECIAL PROCESSES**

This section is not applicable to QL-2R components.

### **SECTION 24.10 INSPECTION**

Inspection required to verify conformance of an item or activity to specified requirements are planned and executed. Characteristics to be inspected and inspection methods to be employed are specified. Inspection results are documented.

### **SECTION 24.11 TEST CONTROL**

Procedures will provide management controls for testing of QL—2AC components. Documents generated utilizing these procedures will contain controls such as hold points, activity checklists, and in many cases, step-by-step signs-offs which indicate the status of testing.

### **SECTION 24.12 CONTROL OF MEASURING AND TEST EQUIPMENT**

Processes affecting quality of items or services are controlled. To maintain accuracy within specified limits, the LES QA Program requires that devices (e.g., tools, gauges, instruments), and measuring and test equipment, including process-related instrumentation and controls that are used in activities affecting the quality of items, are properly controlled, calibrated, and adjusted at specified periods in accordance with written procedures. QL-2R components shall be calibrated in accordance with the UUSA requirements for QL-3 calibrations. The QL-3 calibration process is described in Maintenance Department procedures.

### **SECTION 24.13 HANDLING, STORAGE, AND SHIPPING**

Handling, storage, cleaning, packaging, shipping and preservation of QL-2R components is controlled in accordance with requirements of work control documents, shipping instructions or other specified documents, as applicable, to prevent damage or loss and to minimize deterioration.

Measures will be established for marking and labeling for the packaging, shipping, handling and storage of items, as necessary, to adequately identify, maintain and preserve QL-2R components. Markings and labels will indicate the presence of special environments or the need for special controls, if necessary.

**SECTION 24.14 INSPECTION, TEST, AND OPERATIONS STATUS**

Inspection, Test, and Operating status of QL-2R components shall be conducted in accordance with the UUSA requirements for QL-3 component inspection, test and operating status. The QL-3 process is described in UUSA approved procedures.

**SECTION 24.15 NONCONFORMING ITEMS**

Controls for the Nonconforming Items for the QL-2R components will be in accordance with the requirements of Section 15 of the QAPD.

**SECTION 24.16 CORRECTIVE ACTION**

Corrective Action requirements for the QL-2R components will be in accordance with the requirements of Section 16 of the QAPD.

**SECTION 24.17 QUALITY ASSURANCE RECORDS**

Requirements for the identification, generation and control of Quality Assurance Records for the QL-2R components will be in accordance with the requirements of Section 17 of the QAPD.

**SECTION 24.18 AUDITS**

Auditing requirements for the QL-2R components will be in accordance with the requirements of Section 18 of the QAPD.

**SECTION 24.19 PROVISIONS FOR CHANGE**

Any removal of management measures designed to provide assurance of the Redundant Administrative Control IROFS Other Equipment used by the worker would be considered a reduction in commitment and require regulatory approval prior to implementation