



Nuclear Fuel Services, Inc.

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21G-21-0155  
GOV-01-55-04  
ACF-21-0281

October 14, 2021

Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attn: Document Control Desk

- Reference:
- 1) Docket No. 70-143; SNM License 124
  - 2) NFS Physical Protection Plan
  - 3) NFS Letter, NRC-Observed Force-on-Force Exercise dated June 8, 2021 (24Y-21-0001)
  - 4) NRC Temporary Staff Guidance No. TSG-DFM-2020-01, "Fuel Facility Requests for Regulatory Relief Related to COVID-19", 4/21/20
  - 5) NFS Letter, Request for Exemption for NRC-Observed Force-on-Force Exercise (U), dated September 14, 2021 (21G-21-0145)
  - 6) NRC Email, J. Downs to D. Rogers, Request for Supplemental Information on the NFS Request for Exemption from the NRC-Observed Force-on-Force Exercise, dated September 29, 2021

Subject: **Response to NRC Request for Supplemental Information on the NFS Request for Exemption from the NRC-Observed Force-on-Force Exercise (U)**

Dear Mr. Downs:

By our letter dated September 14, 2021, Nuclear Fuel Services, Inc. (NFS) requested exemption for conducting the 2021 NRC-Observed Force-on-Force exercise. In response to the NRC Request for Supplemental Information (Reference 6), received on September 29, 2021, NFS is providing the following responses in the Attachment.

If you or your staff have any questions, require additional information, or wish to discuss this matter further, please contact me at (423) 743-1705, or Mrs. Danielle Rogers, Nuclear Safety and Licensing Section Manager, at (423) 735-5475. Please reference our unique document identification number (21G-21-0155) in any correspondence concerning this letter.

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Sincerely,

**NUCLEAR FUEL SERVICES, INC.**



Tim Knowles  
Safety and Safeguards Director

MLD/smd

Affidavit      Commercial or Financial Information  
Attachment: Additional Supplemental Information

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Copies:

Mr. James Downs  
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Mr. Larry Harris  
NRC Senior Resident Inspector

**AFFIDAVIT  
COMMERCIAL OR FINANCIAL INFORMATION**

I, Tim Knowles, Safety & Safeguards Director at Nuclear Fuel Services, Inc. (NFS), that to the best of my knowledge and beliefs, make the following representation contained herein:

- A. The following document(s) which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure is:

***Attachment to letter (21G-21-0155), dated October 14, 2021:***

**Response to NRC Request for Supplemental Information on the NFS Request for Exemption from the NRC-Observed Force-on-Force Exercise (U)**

- B. The information contained in the document(s) cited in A above has been held in confidence by Nuclear Fuel Services, Inc. (NFS), in that it contains commercial information concerning physical protection of special nuclear material not otherwise designated as Safeguards Information or classified as National Security Information or Restricted Data as specified in Title 10, Code of Federal Regulations, Part 2.390(d)(1). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page, as appropriate, in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of Nuclear Fuel Services, Inc. (NFS), and as such is customarily held in confidence by Nuclear Fuel Services, Inc. (NFS). As such, Nuclear Fuel Services, Inc. (NFS) has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.
- D. The information contained in the document(s) cited in A above has not been made available to public sources by Nuclear Fuel Services, Inc. (NFS), nor has NFS authorized that it be made available. In accordance with NFS' policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside NFS only as required and under suitable agreement providing for nondisclosure and limited use of the information.
- E. The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by Nuclear Fuel Services, Inc. (NFS). The basis for withholding said information is that it contains information, the disclosure of which could provide a competitive advantage for NFS' competitors in the procurement of government and commercial contracts.
- F. The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the parent company of Nuclear Fuel Services, Inc. (NFS) as it is a publicly held company and the information, if disclosed, will lack context or explanation for the shareholders.

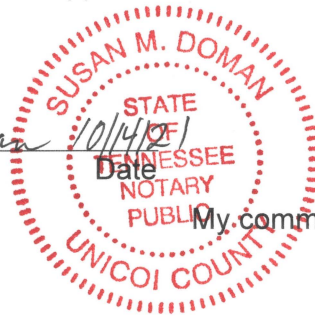
- G. The proprietary/security information that Nuclear Fuel Services, Inc. (NFS) requests to be withheld from public disclosure is contained in the entire document(s) as so marked.

Tim Knowles  
Tim Knowles  
NFS Safety & Safeguards Director

10/14/2021  
Date

I certify the above named person appeared before me and executed this document on this the 14 day of October, 2021.

Susan Marie Doman  
Notary Public



My commission expires: February 27, 2024