



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 9, 2021

Mr. Wyatt Padgett
Licensing and Performance
Assessment Manager
Louisiana Energy Services, LLC
PO Box 1789
Eunice, NM 88231

SUBJECT: LOUISIANA ENERGY SERVICES – AMENDMENT 92, APPROVAL OF
LICENSE AMENDMENT REQUEST REVISING QUALITY PROGRAM
REQUIREMENTS FOR REDUNDANT IROFS (LAR-20-01)
(ENTERPRISE PROJECT IDENTIFIER L-2020-LLA-0208)

Dear Mr. Padgett:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the letter from Louisiana Energy Services, LLC (LES) doing business as URENCO USA, LLC (UUSA) dated September 8, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20262H070) and supplemental letter dated July 13, 2021 (ADAMS Accession No. ML21203A095), requesting a license amendment that would implement a new classification of items relied on for safety (IROFS) called Redundant IROFS. In addition to this new IROFS classification, the amendment request states that for administrative control IROFS that meet the definition of Redundant IROFS, the Quality Level Program for the equipment is being changed from QL-2AC to QL-2R, a new quality level.

The NRC staff has reviewed your request and concludes that with the new license conditions 36 through 39 there is reasonable assurance that the new Redundant IROFS classification represents at least an equivalent replacement of the safety function for the former IROFS. Thus, there is reasonable assurance the LES Integrated Safety Analysis (ISA) program and the ISA Summary will continue to be in compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 70, Subpart H, 10 CFR 70.72(c)(2), 10 CFR 70.62, and 10 CFR 70.61.

Materials License SNM-2010 is hereby amended to add license conditions, 36 – 39, in Section 1.0, “Domestic Safety and Safeguards,” to your license as follows:

- 36 The Redundant IROFS Class, as defined in the Safety Analysis Report, will only be applicable to and implemented on equipment used to support Administrative Control IROFS.

Enclosure 3 transmitted by this letter contains **Security-Related Information**. When separated from Enclosure 3, this letter and Enclosures 1 and 2 are decontrolled.

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- 37 All IROFS are required to adhere to Section 16 of the latest version of the Quality Assurance Program Description identified by License Condition 10(f).
- 38 If equipment is required for administrative control IROFS that are applied to multiple accidents scenarios, the category of QL-2R will only apply if the IROFS is a Redundant IROFS for all accident scenarios to which it applies. If the IROFS applies to accident scenarios for which it is not a Redundant IROFS, the higher category of QL-2AC must be used for the IROFS.
- 39 LES shall submit an amendment request to the NRC prior to making changes to the elements of the quality assurance level QL-2R, that would further reduce or alter the quality assurance level.

In addition, the License Condition 10(b) and 10(f) have been updated with the latest dates of the revisions to the Safety Analysis Report and the Quality Assurance Program Description. All other license conditions shall remain the same. The review by the NRC staff is documented in the safety evaluation report provided in Enclosure 1 to this letter. Enclosures 2 contains the updated public version of the amended materials License SNM-2010 and enclosure 3 contains the non-public license conditions.

This letter concludes action on this submittal, and Enterprise Project Identifier L-2020-LLA-0208 is closed.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter and Enclosures 1 and 2 will be available electronically for public inspection in the NRC Public Document Room (PDR) and in ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. The PDR is currently closed. You may submit your request to the PDR via e-mail at PDR.Resource@nrc.gov or call 1-800-397-4209 between 8:00 a.m. and 4:00 p.m. (EST), Monday through Friday, except Federal holidays.

If you have any questions regarding this matter, please contact me or Mr. Matt Bartlett by telephone at 301-415-7154, or via email to matthew.bartlett@nrc.gov.

Sincerely,

Jacob I. Zimmerman, Chief
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 07003103
License No. SNM-2010

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Enclosures:

1. Safety Evaluation Report
2. Amendment 92 (Public)
3. Amendment 92 (Non-public)

cc: les@listmgr.nrc.gov

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