



Nuclear Fuel Services, Inc.

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21G-22-0029
GOV-01-55-04
ACF-22-0060

February 24, 2022

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) Letter from NFS to NRC, License Amendment Request for U-Metal at the NFS Site, dated November 18, 2021 (21G-21-0092)
3) Letter from NRC to NFS, Request for Supplemental Information – Application for U-Metal License Amendment, dated January 21, 2022
4) Letter from NFS to NRC, Response to NRC Request for Supplemental Information – Application for U-Metal License Amendment, dated February 24, 2022 (21G-22-0028)

Subject: **Response to NRC Request for Supplemental Information – Application for U-Metal License Amendment – Enterprise Project Identification Number L-2021-LLA-0213**

By our letter dated November 18, 2021, Nuclear Fuel Services, Inc. (NFS) submitted a License Amendment Request (LAR) for U-Metal at the NFS Site (Reference 2). By our letter dated February 24, 2022, NFS provided responses to the Request for Supplemental Information (References 3 & 4). NFS hereby submits additional supplemental background information to support the NRC license acceptance review process.

Information contained herein in the Attachment contains sensitive information, is marked as “Unclassified Controlled Nuclear Information,” and is not suitable for public release.

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People Strong

1205 Banner Hill Rd, Erwin, TN 37650

t: +1.423.743.9141 f: +1.423.743.0140 www.nuclearfuelservices.com

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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 Tom Holly, Licensing Manager, at (423) 743-2595. Please reference our unique document identification number (21G-22-0029) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



Tim Knowles
Safety and Safeguards Director

TCH/las

- Affidavit Trade Secrets or Commercial Information
- Enclosure A: Seismic Evaluation of the Nuclear Fuel Services Fuel Fabrication Facility, NSA-TR-NFS-14-1, Rev. 1
- Enclosure B: Seismic Evaluation of Equipment for Nuclear Fuel Services Fuel Fabrication Facility, Adkins-NS-TR-NFS-17-01, Rev. 1
- Enclosure C: 301 HEU Metal Production Facility Integrated Safety Analysis Summary, Rev. 1, pages 1, 2, 12, 55, 56, 98 and 99

Copies:

Mr. James Downs
Senior Project Manager
Division of Fuel Management
Office of Nuclear Material Safety and
Safeguards
US Nuclear Regulatory Commission
Two White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Regional Administrator
US Nuclear Regulatory Commission,
Region II
245 Peachtree Center Ave., NE, Suite
1200
Atlanta, GA 30303-1257
(Letter only)

Mr. Larry Harris
NRC Senior Resident Inspector
(Letter only)

AFFIDAVIT
~~TRADE SECRETS OR COMMERCIAL 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:

Enclosures to letter (21G-22-0029), dated February 24, 2022:

- Enclosure A: Seismic Evaluation of the Nuclear Fuel Services Fuel Fabrication Facility, NSA-TR-NFS-14-1, Rev. 1**
- Enclosure B: Seismic Evaluation of Equipment for Nuclear Fuel Services Fuel Fabrication Facility, Adkins-NS-TR-NFS-17-01, Rev. 1**
- Enclosure C: 301 HEU Metal Production Facility Integrated Safety Analysis Summary, Rev. 1, pages 1, 2, 12, 55, 56, 98 and 99**

- 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

2/24/2022
Date

I certify the above named person appeared before me and executed this document on this the 24 day of February, 2022.

Ashley Stelick 2/24/2022
Notary Public Date

My commission expires: 7/20/2023

