

**From:** [Bartlett, Matt](#)  
**To:** [Love, Barry](#)  
**Subject:** Notice of Administrative Adjustment of the Estimated Completion Date for the LES Risk Assessment Subject to Resolution of the Follow-up Request for Additional Information  
**Date:** Thursday, August 25, 2022 7:58:00 AM

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Barry,

As we discussed during the routine bi-weekly call on August 23, 2022, LES is developing an official response to the follow-up Request for Additional Information sent to you via the email below, dated August 8. Based on the discussion, the NRC staff is modifying the estimated completion date for review of the Risk Assessment from July 2022 to October 31, 2022. The NRC staff may complete the review in advance of this date, subject to resolution of the follow-up RAI.

Thanks.

Sincerely,

Matt Bartlett  
Sr. Project Manager  
NMSS/DFM/FFLB  
301-415-7154

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**From:** Bartlett, Matt  
**Sent:** Monday, August 8, 2022 7:28 AM  
**To:** Love, Barry <Barry.Love@urenc.com>  
**Cc:** Mangefrida, Michael <Michael.Mangefrida@nrc.gov>  
**Subject:** Follow-up Request for Additional Information Regarding the LES Risk Assessment

Barry,

The NRC staff has reviewed the updated LES Risk Assessment, submitted via letter dated July 22, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22208A103). One additional follow-up request for additional information is attached below. Please review it and let me know if we can hold a conference call to discuss the issue. Possible times for a call include after 2:00pm Eastern (12:00pm Mountain) today (Monday) or after 3:00pm Eastern (1:00pm Mountain) on Tuesday – other times are also available.

**FOLLOW-UP REQUEST FOR ADDITIONAL INFORMATION – HIGH WATER MARK**

**Additional Information Needed:**

Adjust page 19 table 14 to align with the Committee on National Security Systems Instructions (CNSSI) 1253 Section 1.2 and 2.1 concerning the use of the National Institute of Standards and Technology (NIST) High Water Mark (HWM) concept.

**Description of the Issue:**

On page 19, table 14 lists the system security categorization developed by Louisiana Energy Services (LES) doing business as URENCO, USA (UUSA) using the appropriate NIST guidance. The table provides an overall security categorization using the HWM concept. However, CNSSI 1253 describes how National Security Systems do not use HWM to reduce the need for excessive tailoring of security controls. While the table as-is does not impact the security categorization or control selection, the documentation should reflect those standards and requirements designed specifically for classified systems.

**Regulatory Basis:**

Both the current version of CNSSI 1253 and the recently superseded version states that, "This Instruction does not adopt the high-water mark (HWM) concept from FIPS 200 Minimum Security Requirements for Federal Information and Information Systems, for categorizing NSS."

**Other Acronyms:**

FIPS – Federal Information Processing Standards  
NSS – National Security System

This email will be placed in Public ADAMS.

Sincerely,

Matt Bartlett  
Sr. Project Manager  
NMSS/DFM/FFLB  
301-415-7154