



January 25, 2023
TJT:23:002

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk (03-H8)
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Gentlemen:

Subject: Submittal of Integrated Safety Analysis (ISA) Summary Annual Update for Framatome Inc.'s (Framatome's) Richland, Washington Fuel Fabrication Facility; License No. SNM-1227; Docket No. 70-1257.

Enclosed with this letter, in digital format, is the annual update of the ISA Summary for Framatome's Richland, Washington nuclear fuel fabrication facility. Attachment A provides a listing of the files contained on this digital file. Framatome requests that this Digital file in its entirety be withheld from public disclosure in accordance with 10 CFR 2.390 or 10 CFR 2.790 in that portions of all files are either commercially proprietary in nature or contain security-related information, respectively. Attachment B provides an affidavit attesting that these files are either proprietary in nature or contain security related information. The annual update is being submitted in accordance with 10 CFR 70.72 (d)(3) and documents the changes to the Richland site's ISA summary. The changes are highlighted in yellow. PDF files with an expanded sized copy of the revised figures are provided on a separate digital file. A list of the files contained on the ISA digital file, including the file name, size, and sensitivity level (commercially proprietary or security-related) for each file, is included as Attachment C to this letter.

Technical contact information relative to the Richland Site ISA is as follows:

Framatome Inc.
Attn: William L. Doane, Manager
Nuclear Safety
2101 Horn Rapids Road
Richland, WA 99354
Phone: 509-375-8717
Email: william.doane@framatome.com

Additionally, I can be reached at 509-375-8550 or via email at timothy.tate@framatome.com.

Very truly yours,

T. J. Tate, Manager
Environmental, Health, Safety & Licensing

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c: Richard Jervey, NRC

Attachment A: List of Electronic Files

Attachment B: Affidavit requesting that the Framatome ISA summary be handled as proprietary information.

Attachment C: Table of Contents and File Designations

Enclosure: Two Digital Letter book files submitted into NRC portal; TJT:23:002 Submittal of Integrated Safety Analysis (ISA) Summary Annual Update for Framatome's Inc.'s (Framatome's) Richland, Washington Fuel Fabrication Facility; License No. SNM-1227; Docket No. 70-1257. Second letter book TJT:23:003 Framatome Inc. (Richland) Summary of Facility Changes Made during Calendar Year 2022

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bc: w/o enclosures
WL Doane
L Stephens
CD Manning

ATTACHMENT A

FOLDER: Chapters

Part 1 - Chapters 1 through 8 (One File)

File Name: 001 E15-01-1 Chapters 1-8 Version 28.pdf

Chapter 1 - Introduction

Chapter 2 - Horn Rapids Road Site Information

Chapter 3 - Overview of AREVA Facilities, Operations and Hazards

Chapter 4 - ISA Team Credentials and Standard Methodologies

Chapter 5 - Quantitative Standards for Acute Chemical Exposures

Chapter 6 - Definition of Terms

Chapter 7 - General External and Facility Hazards

Chapter 8 - Horn Rapids Plant Administrative and Management Measures

Part 2 - Chapter 9 through 19 (Various Files)

Chapter 9 - UO₂ Building

File Name: 002 E15-01-2.9A Version 20.0 - UO2 Building.pdf

Chapter 9 - UO₂ Building

File Name: 003 E15-01-2.9B Version 21.0 - UO2 Building.pdf

Chapter 9 - UO₂ Building

File Name: 004 E15-01-2.9C Version 21.0 - UO2 Building.pdf

Chapter 9 - UO₂ Building

File Name: 005 E15-01-2.9D Version 20.0 - UO2 Building.pdf

Chapter 9 - UO₂ Building

File Name: 006 E15-01-2.9E Version 20.0 - UO2 Building.pdf

Chapter 10 - Dry Conversion Facility

File Name: 007 E15-01-2.10 Ver 20.0 - Dry Conv Facility.pdf

Chapter 11 - SF Building

File Name: 008 E15-01-2.11 Version 21.0 - SF Building.pdf

Chapter 12 - ELO Building

File Name: 009 E15-01-2.12 Version 20.0 - ELO Building.pdf

Chapter 13 - UF₆ Cylinder Recertification Facility

File Name: 010 E15-01-2.13 Version 15.0 - UF6 Cyl Recert.pdf

Chapter 14 - Ammonia Recovery Facility and Industrial Waste Water Treatment System

File Name: 011 E15-01-2.14 Ver 20.0 - ARF and Ind Waste.pdf

Chapter 15 - Blended Dysprosium and Uranium Processing Facility (BDU)

File Name: 012 E15-01-2.15 Version 13.0 - BDU Proc Fac.pdf

Chapter 16 - Detached Storage and Waste Handling Systems

File Name: 013 E15-01-2.16 Version 21 - Detached Storage.pdf

Chapter 17 - Fuel Services Building

File Name: 014 E15-01-2.17 Ver 13.0 - Fuel Services Bldg.pdf

Chapter 18 - Ventilation Systems (Plantwide)

File Name: 015 E15-01-2.18 Ver 20 - Vent Syst Plantwide.pdf

Chapter 19 - Product Development Test Facility

File Name: 016 E15-01-2.19 Version 13.0 PPDF.pdf

Chapter 20 – Ancillary Systems

File Name: 017 E15-01-2.20 Ver 13.0 Ancillary Systems.pdf

Chapter 21 – Uranyl Nitrate Storage Tank Building

File Name: 018 E15-01-2.21 Ver 11.0 UN Storage Tank Bldg.pdf

Chapter 22 – Scrap Uranium Recovery Facility (SURF)

File Name: 019 E15-01-2.22 Ver 4.0 Scrap Uranium Rec. Fac.pdf

Chapter 23 – Generic Comingled Chemical Exposure

File Name: 020 E15-01-2.23 Ver 3.0 Gen. Comingled Chem Expsr.pdf

Revised Figures

Chapters E15-01-1

File Name: 021 E15-01-1 Version 28 Figure 3-1.pdf

Chapter E15-01-1

File Name: 022 E15-01-1 Version 28 Figure 3-2.pdf

Chapter E15-01-2.9C

File Name: 023 E15-01-2.9C Version 21 Figure 9-9.pdf

Chapter E15-01-2.9C

File Name: 024 E15-01-2.9C Version 21 Figure 9-11.pdf

Chapter E15-01-2.10

File Name: 025 E15-01-2.10 Version 20 Figure 10-1.pdf

Chapter E15-01-2.10

File Name: 026 E15-01-2.10 Version 20 Figure 10-2.pdf

Chapter E15-01-2.10

File Name: 027 E15-01-2.10 Version 20 Figure 10-3.pdf

4. The Annual ISA Summary Update contains commercial information of a confidential nature that is not available in public sources or available to the public. Sections also contain information that is considered security sensitive in accordance with USNRC RIS 2005-31. This information contained in the Annual ISA Summary Update is commercial and confidential because it:

- A. Reveals distinguishing aspects of Framatome's manufacturing processes by relating sequences of operations and/or sub-operations to optimize the efficiency and performance of manufacturing operations which a competitor within the field of nuclear fuel manufacturing may adapt for their own processes, reducing the competitor's expenditure of resources to achieve the same efficiencies, thereby gaining a competitive advantage to the disadvantage of Framatome.
- B. Reveals the use of process chemical additives for the enhancement of chemical processes which are believed to be unique in the industry both in terms of type and application, which if revealed to a competitor would provide for an unfair competitive advantage by reducing any expenditure by the competitor to develop and test the same concepts.
- C. Reveals aspects of privately funded development of process controls and parameters derived by Framatome over the course of optimizing the performance of waste treatment and other processes.
- D. Reveals technical rationale developed by Framatome relating to plant layout, structure, process flow and other technical information which a competitor could readily use without expenditure of funds and replicate in its facilities thereby gaining a competitive advantage to the disadvantage of Framatome.

5. Framatome Inc. will suffer considerable competitive harm if the contents of the license amendment package are made available to Framatome domestic and international competitors. Finally, this material cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 25 day of January, 2023.



Timothy J. Tate
Manager, Environmental, Health, Safety and Licensing

STATE OF WASHINGTON)
 :
 : ss
COUNTY OF BENTON)

On this 25 day of January, 2023, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Timothy J. Tate to me known to be the Manager, Environmental, Health, Safety, and Licensing of Framatome Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.



Katherine Lynn Kerr
Notary Public in and for the State of Washington,
residing at Benton, Washington.
My commission expires: September 12th, 2026

