



LES-25-143-NRC

October 8, 2025

Attn: Document Control Desk
Director, Division of Fuel Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Louisiana Energy Services, LLC
NRC Docket No. 71-0940

Subject: Request for Exemption and Deviation from Current Regulatory Limits on Transport of Enriched Uranium Within the United States

Reference: 1) LES-25-142-NRC, Part 71 Quality Assurance Manual (QAM) Revision, dated October 7, 2025 (ML25280A232)
2) Certificate of Compliance No. 9362 Rev 5 Model DN30 Package (ML24159A020)
3) Louisiana Energy Services, LLC User Registration for Certificate of Compliance No. 9362, dated 16 October 2019 (ML19294A292)
4) UUSA Material License SNM-2010 Amendment 105 (ML24318C240 pkg)

Louisiana Energy Services, LLC, also dba Urenco USA (UUSA), in accordance with 10 CFR 71.12, respectfully requests regulatory exemptions proposed herein for domestic transportation of uranium hexafluoride (UF₆), enriched to greater than 5, but less than 10 weight percent (w/o) ²³⁵U utilizing 30B cylinders within certified DN30 protective structural packages (i.e. transportation package) for transport in the United States. Pursuant to the requirements of 10 CFR 71.17(c)(2) and 71.17(c)(3), UUSA is submitting this exemption request to implement revisions to meet the requirements of 10 CFR 71.107(c). Associated with this exemption request, UUSA has separately submitted to NRC, proposed revisions of the UUSA 10 CFR 71 Subpart H Quality Assurance Manual for Packaging and Transportation of Radioactive Materials for Urenco USA in order to acknowledge limited design analysis authority along with associated changes to our Quality Assurance Program Description, in accordance with 10 CFR 71.101(f) (Reference 1).

This submittal also seeks to obtain the approval of deviations to the DN30 transportation package Certificate of Compliance (CoC) to allow for such use of the transportation package (Reference 2) to transport UF₆ enriched to greater than 5, but less than 10 weight percent (w/o) ²³⁵U utilizing 30B cylinders. UUSA is currently a registered user of the DN30 transportation package (Reference 3). UUSA Material License SNM-2010 was amended to allow enrichment up to the less than 10 w/o percent ²³⁵U (Reference 4).

Additional details are provided in Enclosure 2 in the form of an Introduction, Proposed Exemptions and Deviations, Technical Basis for the Exemptions and Deviations and Safety Significance Determination. The environmental information needed to evaluate the proposed

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exemptions and deviations under 10 CFR 51.30 are included as Enclosure 3. Enclosure 4 contains the UUSA calculation reports supporting this request that provide the bases for the proposed exemptions and deviations request by implementing limited design analysis authority. Enclosures 2 and 4 contain proprietary information and should be withheld from release to the public in accordance with 10 CFR 2.390(a)(4). An affidavit supporting this request is provided in Enclosure 1.

Special Permit Authorization for transport will also be requested separately from Department of Transportation upon obtaining NRC approval of this exemption request.

UUSA appreciates the efforts of the NRC staff in supporting the review and approval of these exemptions and deviations request in a timely manner. Should there be any questions concerning this submittal, please contact Barry Love, Licensing Manager, at 575-394-4482.

Respectfully,

A handwritten signature in black ink, appearing to read 'Paul Lorskulsint', is written over a light blue horizontal line.

Digitally signed by Paul Lorskulsint
Date: 2025.10.08 07:35:25 -06'00'

Paul Lorskulsint
Chief Nuclear Officer and Head of Compliance

- Enclosures:
- 1) Affidavit
 - 2) Description of Proposed Exemption and Deviation Request for 30B Cylinders Within DN30 Protective Structural Packaging
 - 3) Environmental Assessment Information
 - 4) UUSA Calculation Reports

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cc: via email

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