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| | **MATERIALS LICENSE** | |

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, *Code of Federal Regulations*, (10 CFR) Chapter I, Parts 11, 30, 31, 32, 33, 34, 35, 36, 39, 40, 70, 73, and 74 and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material (SNM) designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the U.S. Nuclear Regulatory Commission (NRC) now or hereafter in effect and to any conditions specified below.

| Licensee | |
|---|---|
| 1. American Centrifuge Operating, LLC (ACO) | 3. License Number: SNM-2011, Amendment 35 |
| 2. American Centrifuge Plant (ACP) | 4. Expiration Date: See Condition 13 |
| P.O. Box 628 | 5. Docket No. 70-7004 |
| Piketon, Ohio 45661-0628 | |

Commercial ACP Possession Limits

| 6. Source, Special Nuclear Material, Byproduct Material | 7. Chemical and/or Physical Form Under This License | 8. Maximum amount that Licensee May Possess at any One Time |
|---|---|---|
| A. Uranium (natural and depleted) and daughter products | A.1 Physical: Solid, Liquid, and Gas<br>A.2 Chemical: $UF_6$, $UF_4$, $UO_2F_2$, oxides, metal, and other compounds | A. [Security-Related Information Withheld Under 10 CFR 2.390] |
| B. Uranium enriched in isotope U-235 up to 10 percent by weight and uranium daughters | B.1 Physical: Solid, Liquid, and Gas<br>B.2 Chemical: $UF_6$, $UF_4$, $UO_2F_2$, oxides, metal, and other compounds | B. [Security-Related Information Withheld Under 10 CFR 2.390] |
| C. Tc-99, transuranic isotopes and other contamination | C. Any | C. [Security-Related Information Withheld Under 10 CFR 2.390] |

| | | |
|---|---|---|
| D. Source Material isotopes and other contamination | D.1 Physical: Solid, Liquid (excluding $UF_6$)<br><br>D.2 Soluble and insoluble Chemicals, metal | D. [Security-Related Information Withheld Under 10 CFR 2.390] |
| E. Uranium enriched in isotope U-245 from 10 percent to 20 percent by weight and uranium daughters | E.1 Physical: Solid, Liquid, and Gas<br><br>E.2 Chemical: $UF_6$, $UF_4$, $UO_2F_2$, oxides, metal, and other compounds | E. [Security-Related Information Withheld Under 10 CFR 2.390] |
| F. Uranium enriched in isotope U-235 from 20 percent to 98 percent by weight and uranium daughters | F.1 Physical: Solid, Liquid, and Gas<br><br>F.2 Chemical: $UF_6$, $UF_4$, $UO_2F_2$, oxides, metal, and other compounds | F. [Security-Related Information Withheld Under 10 CFR 2.390] |
| G. Special Nuclear Material | G. Any | G. [Security-Related Information Withheld Under 10 CFR 2.390] |
| H. Special Nuclear Material Source | H. Any | H. [Security-Related Information Withheld Under 10 CFR 2.390] |
| I. Byproduct Material | I. Any | I. [Security-Related Information Withheld Under 10 CFR 2.390] |

<u>HALEU Demonstration Program Possession Limits</u>

| 6.a. Source, Special Nuclear Material, Byproduct Material | 7a. Chemical and/or Physical Form Under This License | 8a. Maximum amount that Licensee May Possess at any One Time |
|---|---|---|
| A. Uranium (non-fissile) and daughter products | A.1 Physical: Solid, Liquid (excluding $UF_6$), and Gas<br><br>A.2 Chemical: $UF_6$, $UF_4$, $UO_2F_2$, oxides, metal, and other compounds | A. [Security-Related Information Withheld Under 10 CFR 2.390] |

| | | |
|---|---|---|
| B. Source Material isotopes and other contamination | B.1 Physical: Solid, Liquid (excluding $UF_6$)<br>B.2 Soluble and insoluble chemicals, metal | B. [Security-Related Information Withheld Under 10 CFR 2.390] |
| C. Special Nuclear Material Uranium enriched in isotope $^{235}U$ up to 5 percent by weight and uranium daughters | C.1 Physical: Solid, Liquid (excluding $UF_6$), and Gas<br>C.2 Chemical: $UF_6$, $UF_4$, $UO_2F_2$, oxides, metal, and other compounds | C. [Security-Related Information Withheld Under 10 CFR 2.390] |
| D. Special Nuclear Material Uranium enriched in isotope $^{235}U$ from 5 up to but less than 20 percent by weight | D.1 Physical: Solid, Liquid (excluding $UF_6$), and Gas<br>D.2 Chemical: $UF_6$, $UF_4$, $UO_2F_2$, oxides, metal, and other compounds | D. [Security-Related Information Withheld Under 10 CFR 2.390] |
| E. Special Nuclear Material Uranium enriched in isotope $^{235}U$ from 20 up to 25 percent by weight | E.1 Physical: Solid, and Gas<br>E.2 Chemical: $UF_6$, $UF_4$, $UO_2F_2$, oxides, and other compounds | E. [Security-Related Information Withheld Under 10 CFR 2.390] |
| F. Special Nuclear Material Plutonium | F. Sealed Source | F. [Security-Related Information Withheld Under 10 CFR 2.390] |
| G. Special Nuclear Material Plutonium | G. Unsealed Source | G. [Security-Related Information Withheld Under 10 CFR 2.390] |
| H. Special Nuclear Material Americium | H. Process Contaminants | H. [Security-Related Information Withheld Under 10 CFR 2.390] |
| I. Byproduct Material | I. Any | I. [Security-Related Information Withheld Under 10 CFR 2.390] |

9. Authorized place of use: ACP, located on the Portsmouth Department of Energy Reservation in Piketon, Ohio.

10. The licensee shall conduct authorized activities at the ACP in accordance with the statements, representations, and conditions, or as revised in accordance with section 19 of the Quality Assurance Program Description, 10 CFR, Paragraph 40.35(f) and 10 CFR sections 51.22, 70.32, 70.72, and 95.19 in:

    a. Decommissioning Funding Plan (DFP) dated August 23, 2004, as modified by revisions dated March 14, 2005, May 23, 2005, June 22, 2005, August 30, 2005, September 2, 2005, October 21, 2005, November 30, 2005, March 17, 2006, August 23, 2006, June 16, 2008, January 30, 2009, April 30, 2010, February 28, 2011, and October 27, 2011.

    b. Emergency Plan dated August 23, 2004, as modified by revisions dated March 14, 2005, May 23, 2005, June 17, 2005, August 30, 2005, October 7, 2005, November 7, 2005, November 17, 2005, February 17, 2006, June 1, 2006, August 23, 2006, June 26, 2007, January 14, 2008, January 25, 2008, June 16, 2008, January 30, 2009, September 30, 2009, January 20, 2010, April 30, 2010, August 11, 2010, February 28, 2011, April 29, 2011, April 30, 2012, September 10, 2012, February 28, 2013, October 30, 2013, November 27, 2013, February 28, 2014, August 14, 2015, June 30, 2016, February 2020, May 9, 2024, and May 13, 2026.

    c. Environmental Report dated August 23, 2004, as modified by revisions dated May 4, 2005, June 15, 2005, July 29, 2005, August 16, 2005, October 21, 2005, November 29, 2005, February 17, 2006, August 23, 2006, January 14, 2008, January 25, 2008, June 16, 2008, December 16, 2008, January 30, 2009, January 20, 2010, April 30, 2010, August 11, 2010, May 25, 2021, April 28, 2022, September 12, 2024, and December 19, 2024.

    d. Fundamental Nuclear Material Control Plan dated August 23, 2004, as modified by revisions dated March 14, 2005, May 12, 2005, October 7, 2005, February 17, 2006, August 23, 2006, January 25, 2008, June 16, 2008, October 29, 2008, January 30, 2009, April 30, 2010, October 22, 2010, July 11, 2012, September 10, 2012, October 30, 2013, August 14, 2015, December 18, 2015, May 25, 2021, April 28, 2022, September 12, 2024, and December 19, 2024.

    e. License Application dated August 23, 2004, as modified by revisions dated March 14, 2005, April 29, 2005, May 23, 2005, June 15, 2005, June 22, 2005, August 30, 2005, September 2, 2005, September 27, 2005, October 7, 2005, November 7, 2005, November 17, 2005, November 30, 2005, December 2, 2005, January 16, 2006, March 17, 2006, June 1, 2006, August 23, 2006, August 31, 2006, September 6, 2006, June 26, 2007, October 11, 2007, January 14, 2008, January 25, 2008, March 5, 2008, June 16, 2008, October 9, 2008, December 16, 2008, January 15, 2009, January 30, 2009, October 28, 2009, January 20, 2010, February 24, 2010, April 30, 2010, June 7, 2010, August 11, 2010, August 30, 2010, October 22, 2010, November 17, 2010, February 28, 2011, March 18, 2011, April 29, 2011, September 15, 2011, October 27, 2011, September 10, 2012,

February 20, 2013, February 28, 2013, September 5, 2013, November 27, 2013, December 30, 2013, February 28, 2014, August 14, 2015, December 18, 2015, June 30, 2016, May 25, 2021, April 28, 2022, November 30, 2022, February 13, 2023, June 29, 2023, February 15, 2024, March 7, 2024, May 9, 2024, September 12, 2024, October 17, 2024, January 2, 2025, January 30, 2025, and December 19, 2024, and June 12, 2025.

f. Quality Assurance Program Description dated August 23, 2004, as modified by revisions dated March 14, 2005, November 7, 2005, February 17, 2006, January 25, 2008, July 18, 2008, October 9, 2008, January 15, 2009, January 30, 2009, June 10, 2009, September 4, 2009, October 28, 2010, April 30, 2010, August 11, 2010, August 30, 2010, November 17, 2010, September 10, 2012, February 20, 2013, August 14, 2015, June 30, 2016, August 31, 2016, December 16, 2016, and May 25, 2021.

g. DELETED by Amendment 13

h. DELETED by Amendment 5

i. DELETED by Amendment 5

j. DELETED by Amendment 2

k. Security Plan for the Protection of Classified Matter at the United States Enrichment Corporation Headquarters in Bethesda, Maryland, dated January 15, 2009 (revision 12), as modified by revision dated February 20, 2013 (revision 13); Security Plan for the Protection of Classified Matter at Centrus Energy Corp. (formerly USEC) headquarters dated August 2015 (revision 0); and Security Plan for the Protection of Classified Matter at Centrus Energy Corp. headquarters dated March 2016 (revision 0) and October 2019 (Revision 3).

l. DELETED by Amendment 16

m. DELETED by Amendment 16

n. DELETED by Amendment 16

o. Transportation Security Plan for Classified Matter Shipments dated November 25, 2008, as modified by revisions dated April 12, 2010, November 17, 2010, February 28, 2013, March 13, 2017, and September 30, 2020; and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittal dated March 10, 2020.

p. Operations Security Plan 331-06-161, approved January 20, 2012, as modified by revisions dated December 2012 (approved January 25, 2013), December 2013 (approved on April 1, 2014), November 2014 (approved on July 8, 2015), and March 2020 (approved on October 30, 2020).

q. DELETED by Amendment 5

r. DELETED by Amendment 5

s. Security Plan for the Protection of Classified Matter at the ACP SP-3605-0041 dated October 16, 2020; and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittals dated March 31, 2020, April 7, 2022, March 20, 2024, July 25, 2024, August 8, 2024, September 12, 2024, and December 19, 2024.

t. ACO Information System Security Plan SEC-18-0002 submittal dated September 10, 2020, as modified by submittal dated March 8, 2022; and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittals dated March 31, 2020 for the Piketon facility, February 6, 2020 and March 12, 2026 for the Oak Ridge facility, and October 27, 2021, April 6, 2023, October 19, 2023, July 10, 2025, August 14, 2025, February 11, 2026, and May 21, 2026 for the Oak Ridge, Piketon, Bethesda and Cheswick facilities.

u. High Assay Low Enriched Uranium (HALEU) Cascade Engineering, Procurement, and Construction Temporary Security Plan SP-3605-0018 dated October 16, 2020; and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittal dated March 31, 2020.

v. DELETED by Amendment 16

w. Security Program for ACO at Oak Ridge, Tennessee NR-SP-ACO-OR-0001 dated September 8, 2020, and June 23, 2022; and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittals dated February 6, 2020, March 31, 2022, April 7, 2022, March 20, 2024, July 25, 2024, August 8, 2024, March 12, 2026, May 14, 2026, and July 15, 2026.

x. ACO – Oak Ridge Operations Security Plan PLD1-SP-024PD dated February 5, 2020; and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittal dated February 6, 2020.

y. Security Plan for the Physical Protection of SNM at the ACP SP-3605-0042 dated May 25, 2021; and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittals dated April 22, 2020, May 7, 2020, June 23, 2020, April 7, 2022, February 15, 2024, May 23, 2024, September 12, 2024, September 19, 2024, December 19, 2024, and May 7, 2026.

z. Classified Distributed Control System Information System Security Plan at the ACP SP-3605-0043 dated August 2021 (revision 0), and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittals dated December 22, 2020, February 11, 2026, and May 21, 2026.

aa. ACO Classified Process Telephone System for X-3001, X-3012 and X-1107E in Piketon, Ohio (revision 0), SP-3605-0044 dated November 2021, and in accordance with statements, representations, and conditions, pertaining to the NRC's approval of license amendment application submittal dated April 12, 2021.

bb. Temporary Security Plan for ACO at Oak Ridge, Tennessee NR-SP-ACO-OR-0002 dated June 30, 2025, as modified by revisions dated August 21, 2025, January 15, 2026, and February 10, 2026.

cc. Security Addendum for the Curtiss-Wright facility in Cheswick, Pennsylvania - Supporting the American Centrifuge Program, CW-EMD-ACP-01 dated February 11, 2026, as modified by revisions dated May 21, 2026.

dd. Temporary Security Plan for ACO at Piketon, Ohio SP-3605-0089 dated May 13, 2026.

11. Introduction of $UF_6$ into any module of the ACP, including the HALEU Demonstration cascade, shall not occur until the Commission completes an operational readiness and management measures verification review to verify that management measures that ensure compliance with the performance requirements of 10 CFR Section 70.61 have been implemented and confirms that the facility has been constructed and will be operated safely and in accordance with the requirements of the license. The licensee shall provide the Commission with 120 days advance notice of its plan to introduce $UF_6$ in any module of the ACP, including the HALEU Demonstration cascade.

12. The licensee is hereby granted the special authorizations and exemptions identified in section 1.2.5 of the ACP license application, dated September 2006, as modified by revisions dated December 2012, and May 2021.

13. This license will expire on April 13, 2037.

14. ACO shall provide to the Commission, at least 120 days prior to the planned date for obtaining licensed material, other than material for the HALEU Demonstration Program, documentation of any liability insurance required to be obtained by ACO under its lease with the U.S. Department of Energy (DOE) for the ACP by that time or, alternatively, the status of ACO's efforts to obtain any such liability insurance. During the time that ACO is engaged in efforts to obtain liability insurance, ACO shall provide the Commission with status reports regarding those efforts. The status reports shall be submitted at a frequency of at least once every six months following issuance of a license. ACO shall notify the Commission within 30 days upon receiving notification of denial or approval of commercial liability insurance for the ACP. If commercial liability insurance is required to be obtained under its lease with DOE, within 60 days of receiving notification of approval of commercial liability insurance, ACO shall provide proof of liability insurance coverage and a justification, for Commission review and approval, if ACO is proposing to provide less than $300 million of liability insurance coverage.

15. Construction of each incremental phase of the ACP shall not commence before funding for that increment is available or committed. Of this funding, ACO must have in place before constructing such increment, commitments for one or more of the following: equity contributions from ACO, affiliates and/or partners, along with lending and/or lease arrangements that solely or cumulatively are sufficient to ensure funding for the particular increment's construction costs. ACO shall make available for NRC inspection, documentation of both the budgeted costs for such phase and the source of funds available or committed to pay those costs.

Operation of the ACP, with the exception of operation of the HALEU Demonstration cascade until expiration of DOE's HALEU Demonstration contract, or up to the currently authorized possession limits defined with this Materials License (whichever comes first), shall not commence until the Licensee has in place either: (1) long term contracts lasting five years or more that provide sufficient funding for the estimated cost of operating the facility for the five year period; (2) documentation of the availability of one or more alternative sources of funds that provide sufficient funding for the estimated cost of operating the facility for five years; or (3) some combination of (1) and (2).

16. ACO shall provide final copies of the proposed financial assurance instruments to NRC for review at least six months prior to the planned date for obtaining licensed material (except for the sealed source and byproduct material calibration sources described in LC 6 and the HALEU Demonstration cascade under the lease agreement with DOE ending December 31, 2025), and provide to NRC final executed copies of the reviewed financial assurance instruments prior to the receipt of licensed material (except for the sealed source and byproduct material calibration sources described in LC 6 and the HALEU Demonstration cascade under the lease agreement with DOE ending December 31, 2025). The amount of the financial assurance instrument shall be updated to current year dollars and include any applicable changes to the decommissioning cost estimate. The decommissioning cost estimate shall include an update to ACO's Analysis of Depleted Uranium Disposal Costs for the ACP. To develop this update, ACO shall coordinate with DOE to determine necessary changes to the DOE contractor's depleted uranium cost estimate utilized as input to the ACO specific analysis.

17. The initial and subsequent updated DFP cost estimates, up to the time of full capacity operations, and revised funding instruments shall be provided annually and shall provide full funding for decontamination and decommissioning of the full-size facility, except:

    (1) The cost estimate for decontamination and removal of the centrifuges shall be provided on an annual forward-looking basis based on planned incremental enrichment capacity increases; and

    (2) The cost estimate for depleted uranium byproduct generation shall be provided on a projected annual forward-looking basis. The decommissioning cost estimate shall include an update to ACO's Analysis of Depleted Uranium Disposal Costs for the ACP. To develop this update, ACO shall coordinate with DOE to determine necessary changes to the DOE contractor's depleted uranium cost estimate utilized as input to the ACO specific analysis.

    Once full capacity operation is achieved, the licensee shall provide cost estimates for depleted uranium byproduct generation on an annual forward-looking basis and cost estimates for decontamination and decommissioning the remainder of the facility at intervals not to exceed 3 years, consistent with the requirements of 10 CFR Paragraphs 30.35(e), 40.36(d) and 70.25(e). The DFP cost estimates shall be provided to NRC for review, and subsequently, after resolution of any NRC comments, final executed copies of the financial assurance instruments shall be provided to NRC.

18. ACO shall utilize its procedure, Item Relied on for Safety (IROFS) Boundary Determination Plan, to define the boundaries of each IROFS. Completed IROFS boundaries for all IROFS shall be available for inspection at the time of the operational readiness review.

19. The licensee shall obtain Commission approval prior to implementing new digital technology within IROFS that use digital technology for previously approved process safety applications, or in any other IROFS of the facility. Such digital technology includes the use of software, firmware, microcode, Programmable Logic Controllers, and/or any digital device, including hardware devices which implement data communication protocols (such as fieldbus devices and Local Area Network controllers). The licensee shall also obtain Commission approval prior to implementing a change to Commission-approved IROFS that incorporate digital technology which adds new or alters the characteristics of existing digital technology as described above.

    Proposed licensee digital technology change(s) shall comply with accepted best practices in software and hardware engineering, including software quality assurance controls as discussed in the Quality Assurance Program Description throughout the development process and the applicable guidance of the following industry standards and regulatory guides:

    a. American Society of Mechanical Engineers NQA-1-2008 with the NQA-la-2009 Addenda, Part I, Requirement 3, "Design Control," section 800, requirement 11, "Test Control," and Part II, Subpart 2.7, "Quality Assurance Requirements for Computer Software for Nuclear Facility Applications."

    b. Regulatory Guide 1.168, “Verification, Validation, Reviews, and Audits for Digital Computer Software Used in Safety Systems of Nuclear Power Plants,” revision 2, July 2013.

    c. Regulatory Guide 1.169, “Configuration Management Plans for Digital Computer Software Used in Safety Systems of Nuclear Power Plants,” revision 1 July 2013.

    d. Regulatory Guide 1.170, “Software Test Documentation for Digital Computer Software Used in Safety Systems of Nuclear Power Plants,” revision 1 July 2013.

    e. Regulatory Guide 1.172, “Software Requirements Specifications for Digital Computer Software Used in Safety Systems of Nuclear Power Plants,” revision 1 July 2013.

    f. Regulatory Guide 1.173, “Developing Software Life Cycle Processes for Digital Computer Software Used in Safety Systems of Nuclear Power Plants,” revision 1 July 2013.

20. ACO shall provide a minimum 60-day notice to NRC prior to initial customer product withdrawal of licensed material exceeding 5 wt. percent $^{235}U$ enrichment. This notice shall identify the necessary equipment and operational changes to support customer product shipment for these assays.

21. The licensee shall maintain and follow the Fundamental Nuclear Material Control Program for control and accounting and measurement control of uranium source material and special nuclear material at the ACP pursuant to 10 CFR Paragraph 74.33(b). The licensee shall make no change to material control procedures essential for the safeguarding of uranium source material or special nuclear material that would decrease the effectiveness of the material control and accounting program implemented pursuant to 10 CFR Paragraph 74.33(b) without prior approval of the Commission. If the licensee desires to make changes that would decrease the effectiveness of its material control and accounting program or its measurement control program, the licensee shall submit an application for amendment to its license pursuant to 10 CFR Section 70.34.

    The licensee shall maintain records of changes to the material control and accounting program made without prior Commission approval for a period of five years from the date of the change. The licensee shall furnish to the Director, Division of Security, Operations, Office of Nuclear Security and Incident Response, using an appropriate method listed in 10 CFR Paragraph 70.5(a), a report containing a description of each change within six months of the change if it pertains to uranium enriched less than 20 percent in the $^{235}U$ isotope.

22. The licensee shall not use, process, store, reproduce, transmit, handle, or allow access to classified matter except provided by applicable personnel and facility clearances as required under 10 CFR Part 95.

23. With respect to the lease for the ACP facilities entitled "Supplemental Agreement No. 1 to the Lease Agreement Between the United States Department of Energy and the United States Enrichment Corporation" dated December 7, 2006, the licensee shall:

    a. Provide to the NRC a copy of the written notice that is required to be provided to the DOE regarding lease renewal at the same time that it is provided to the DOE.

    b. Provide to the NRC a copy of the written notice that is required to be provided to the DOE regarding the licensee's decision to terminate the lease at the same time that it is provided to the DOE.

    c. Inform the NRC within 24 hours upon being informed by DOE that it is terminating the lease; and

    d. Provide to the NRC a copy of any modifications to the lease within 30 days of the modification being signed.

24. A change to the facility or its processes is evaluated before the change is implemented using the criteria below. The evaluation of the change determines, before the change is implemented, whether an application for an amendment to the license application is required to be submitted in accordance with 10 CFR 70.34.

    a. The licensee may make changes to the license application, without prior NRC approval, if the change:

        i. Does not decrease the level of effectiveness of the design basis as described in the license application.
        ii. Does not result in a departure from a method of evaluation described in the license application used in establishing the design bases.
        iii. Does not result in a degradation in safety.
        iv. Does not affect compliance with applicable regulatory requirements; and
        v. Does not conflict with an existing license condition.

    b. If a change to the license application is made, the affected on-site documentation will be updated promptly per written procedures. The licensee maintains records of changes to its facility. These records include a written evaluation that provides the bases for the determination that the changes to the license application do not require prior NRC approval. These records are maintained until termination of the license.

    c. Changes are communicated to the NRC as follows:

        i. For changes that require NRC pre-approval, the licensee submits an amendment request to the NRC in accordance with 10 CFR 70.34 and 70.65.

        ii. For changes to the license application that do not require NRC pre-approval, the licensee submits to the NRC annually, within 30 days after the end of the calendar year during which the changes occurred, a brief summary of the changes.

25. The licensee will request prior NRC approval before any liquid $UF_6$ operations commence at the ACP.

26. ACO shall not enrich $UF_6$ in excess of 20.0 wt.% U-235, other than in the course of cascade performance adjustments, thus providing the operational flexibility to generate material to satisfactorily fulfill customer orders up to 20.0 wt.% U-235. ACP shall not input parameters to extract product material for the assay above 20.0 wt.% U-235 at any time.

27. Within 30 days of making any non-administrative changes to the criticality computer code validation report EE-3101-0013, the licensee shall provide the Commission with a summary of changes and shall provide the revised validation report upon request. The licensee may not implement changes to reduce the margin of subcriticality for safety (i.e., factors or methods that would adversely affect the Upper Subcritical Limit) without NRC approval of the change.

28. The licensee will establish, maintain, and implement a maintenance, testing and calibration program to ensure that security systems and equipment are tested for operability and performance at predetermined intervals, maintained in operable condition, and are capable of performing their intended functions.

29. DELETED by Amendment 23

30. ACO shall establish and maintain a Vehicle Barrier System in accordance with Section 3.7 of SP-3605-0042. Additionally, ACO shall not produce more than the authorized possession limits beyond those approved on June 11, 2021, until such time that the additional physical security measures have been installed and NRC has confirmed they meet the new commitments described within Section 3.7 of SP-3605-0042. Upon a successful NRC validation, ACO will be authorized to continue production efforts up to the authorized possession limits described in SNM-2011.

31. ACO shall provide at least a 30-day prior written notification to the NRC of anticipated or needed changes to its HALEU Demonstration contract that are material to ACO's license, including contract completion date extensions and DOE funding at similar or higher levels for additional option periods. Such written notifications shall include the anticipated or needed changes to the contract and the status of DOE's review with respect to a proposed change. Should substantive changes be made to the HALEU Demonstration contract that affects the NRC's prior authorization to increase the possession limits of Phase III in its entirety, ACO shall submit a request to amend the necessary licensing documentation.

32. ACO is exempted from the requirements of 10 CFR 70.24(a) insofar as such requirements apply to the following:

    a. the handling, storage, and transportation (on-site transportation of 30-series feed cylinders received from an NRC licensed shipper) of HALEU Demonstration 30-series cylinders containing less than or equal to 5.0 weight percent uranium-235;
    b. operations involving special nuclear material less than 1 weight percent uranium-235 or below 100 grams uranium-235 (i.e., "non-fissile material operations");
    c. areas in which the licensee determines criticality is not credible. Determinations of 'not credible' require, at a minimum, that, under normal and credible abnormal conditions, inventory is below 700 grams uranium-235 and massive moderators or reflectors made of graphite, heavy water, or beryllium are not present;
    d. the storage of special nuclear material contained in packages as defined in 10 CFR Part 71 or specifically exempt according to 10 CFR 71.15, provided fissile exempt packages are limited to the size and configuration of the transport conveyance and fissile packages are limited to a criticality safety index of 100, fissile exempt packages and fissile packages are not stored in the same area or are otherwise commingled, and at least 6 meters of spacing is maintained between areas; and
    e. planned events in which the criticality accident alarm system (CAAS) or its associated equipment is out of service, provided compensatory measures are employed and remain effective until the CAAS has been restored to service.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date: **See signature**

By: Signed by Mike McCoppin on 10/28/26

Mike McCoppin, Chief
Fuel Facility Licensing Branch 1
Division of Fuel Cycle
Office of Nuclear Material Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001