



10 CFR 2.390

MAY 28 2008

NEF-08-00095-NRC

Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Louisiana Energy Services, LLC
National Enrichment Facility
NRC Docket No. 70-3103

Subject: License Amendment Request for the National Enrichment Facility to provide an alternate sole Item Relied On For Safety (IROFS) for minimizing UF₆ releases after a Design Basis Earthquake (DBE) (LAR-08-07).

Louisiana Energy Services requests an amendment to the Materials License for the National Enrichment Facility to authorize changes in the applicability of IROFS for the Separation Building Modules (SBMs) for natural phenomena events.

The reason for this submittal is because of a new analysis that supports a risk informed basis for the Integrated Safety Analysis. The new analysis effectively moves the safety function of the building to retain UF₆ into the process piping. This eliminates the structure as an IROFS and credits the piping as the new IROFS.

The Quality Assurance Plan Document (QAPD) is also revised so that Structures, Systems, and Components (SSC) that are not "essential" to IROFS, yet can "affect" an IROFS are Quality Level (QL) 2. Any SSC which is an IROFS remains QL-1. This is a change from the current QAPD which requires all SSC that can affect an IROFS to be QL-1. By this change, the utilities supporting an IROFS are considered "essential".

Louisiana Energy Services requests that the information contained in the enclosures to this letter be withheld from public disclosure pursuant to Title 10 of the Code of Federal Regulations Part 2.390(a)(4). An affidavit requesting the withholding of information provided in the license amendment request is provided in Enclosure 1 as required by Title 10 of the Code of Federal Regulations Part 2.390(b)(1). Enclosure 2 provides a description of the proposed changes along with the justification for the change. Annotated pages for the affected License Basis Documents are included in Enclosure 3.

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If you have any questions, please direct them to Steve Cowne, Licensing Director, at 505-394-4646.

Respectfully,

A handwritten signature in black ink, appearing to read "Gregory OD Smith". The signature is fluid and cursive, with a large initial "G" and "S".

Gregory OD Smith

Chief Operating Officer and Chief Nuclear Officer

Enclosures: Enclosure 1 – Affidavit
 Enclosure 2 – Description of Proposed Changes
 Enclosure 3 – Annotated Changes to the License Basis Documents

cc:

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ENCLOSURE 1

AFFIDAVIT

I, Gregory OD Smith, Chief Operating Officer and Chief Nuclear Officer of Louisiana Energy Services, LLC at the National Enrichment Facility, make the following representations that to the best of my knowledge and beliefs:

1. Louisiana Energy Services wishes to have withheld from public disclosure, the following documents:
 - Letter No. NEF-08-00095-NRC, Enclosure 2, Description of Proposed Changes
 - Letter No. NEF-08-00095-NRC, Enclosure 3, Annotated Changes to License Basis Documents, Annotated Changes for the Emergency Plan only.

2. The information contained in the documents cited in 1 above for which exemption from public disclosure is requested is proprietary information related to commercial aspects of the National Enrichment Facility. Louisiana Energy Services requests that this information be exempt from disclosure pursuant to the provisions in Title 10 of the Code of Federal Regulations Part 2.390(a)(4).

3. The information in these documents describes in detail changes which are proposed to our facility and future buildings which can and will have a significant impact on their cost structure. This knowledge has been gained from several years worth of work by our company and millions of dollars of expense. As a result, public disclosure of the information in the letter has the potential to result in substantial harm to the competitive position of Louisiana Energy Services and reduce or foreclose the availability of profit opportunities.

Gregory OD Smith 05/28/08
 Gregory OD Smith Date
 Chief Operating Officer and Chief Nuclear Officer
 Louisiana Energy Services, LLC
 National Enrichment Facility

I certify the above named person appeared before me and executed this document on this 28th day of May, 2008.

Jana Bolden
 Notary Public My commission expires: 1/23/12

