



10 CFR 70.5

June 29, 2010

AES-O-NRC-10-00380

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

AREVA Enrichment Services LLC  
Eagle Rock Enrichment Facility  
NRC Docket No: 70-7015

**Subject:** Supplemental Information – Categorization of Load Cells as IROFS and Quality Assurance Requirements for Enhanced Administrative IROFS – AREVA Enrichment Services LLC License Application for the Eagle Rock Enrichment Facility

During recent discussions with the NRC, AREVA Enrichment Services LLC (AES) agreed to categorize the load cells used in various plant systems to verify cylinder fill mass as an Item Relied On For Safety (IROFS). A new IROFS has been created for these components. The supplemental information is provided in Enclosure 2. Additionally, AES is providing supplemental information for quality assurance requirements for enhanced IROFS that rely on an instrumentation reading to perform the administrative action. The supplemental information is provided in Enclosure 3.

Enclosure 2 provides the security-related sensitive unclassified non-safeguards information (SUNSI) supplemental information and supporting markups to the Integrated Safety Analysis Summary. The EREF License Application will be revised to include the changes identified in the markups provided in Enclosure 2 in Revision 3 of the EREF License Application.

Enclosure 3 provides the SUNSI related to the application of the Quality Assurance Program Description requirements to enhanced administrative IROFS. The table provides the enhanced IROFS number, a description of the safety function and the QA requirements applied to the various aspects of implementing the IROFS.

Enclosures 2 and 3 contain SUNSI information that AES is requesting be withheld from public disclosure in accordance with 10 CFR 2.390. This information contains quotes from or markups of information that the NRC previously identified as SUNSI. In accordance with 10 CFR 2.390(b), an affidavit supporting our request to withhold this security-related information is provided in Enclosure 1.

**AREVA ENRICHMENT SERVICES LLC**

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If you have any questions regarding this submittal, please contact me at (508) 573-6554.

Respectfully,

A handwritten signature in black ink that reads "J. A. Kay". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

James A. Kay  
Licensing Manager

Enclosures:

- 1) Affidavit of James A. Kay
- 2) Supplemental Information – Categorization of Load Cells as IROFS
- 3) QA Requirements for Enhanced Administrative IROFS

Commitment:

The EREF License Application will be revised to include the changes identified in the markups provided in Enclosure 2 in Revision 3 of the EREF License Application.

cc: Breeda Reilly, U.S. NRC Senior Project Manager

- a) I am the Licensing Manager for the AREVA Enrichment Services LLC (AES), and as such have the responsibility of reviewing the proprietary and confidential information sought to be withheld from public disclosure in connection with our application to construct and operate a uranium enrichment facility. I am authorized to apply for the withholding of such security information from public disclosure on behalf of AES.
- b) I am making this affidavit in conformance with the provisions of 10 CFR 2.390 of the regulations of the Nuclear Regulatory Commission (NRC), and in conjunction with AES' request for withholding, which is accompanied by this affidavit.
- c) I have knowledge of the criteria used by AES in designating information as sensitive unclassified security-related information (SUNSI).
- d) By this submittal, AES seeks to protect from disclosure certain SUNSI contained in Enclosures 2 and 3 for Security-Related Markups of the Integrated Safety Analysis Report.

This affidavit discusses the bases for withholding certain portions of this submittal, as indicated therein, from public disclosure.

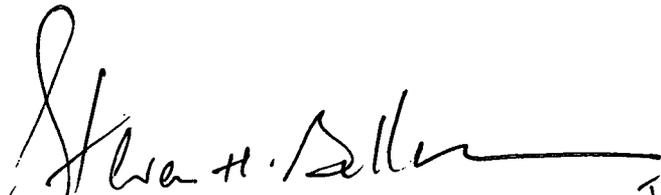
- e) Pursuant to the provisions of 10 CFR 2.390(b)(4), the following is furnished for consideration by the NRC in determining whether the proprietary information sought to be protected should be withheld from public disclosure.
  - 1. For the sensitive unclassified security-related information (SUNSI) the information was identified as SUNSI by the NRC and by AES using the guidance in NRC Regulatory Issue Summary (RIS) 200531, "Control of Security-Related Sensitive Unclassified Non-Safeguards Information Handled by Individuals, Firms, and Entities Subject to NRC Regulation of the Use of Source, Byproduct, and Special Nuclear Material."
  - 2. The information sought to be withheld is being provided to the NRC in confidence, and, under the provisions of 10 CFR 2.390, it is to be received in confidence by the NRC.
  - 3. The information sought to be withheld is not available in public sources, to the best of AES's knowledge and belief.

For all of the reasons discussed above, AES requests that the identified information be withheld from public disclosure.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 30, 2010.

  
\_\_\_\_\_  
Mr. James A. Kay  
Licensing Manager of AES LLC  
400 Donald Lynch Boulevard  
Marlborough, MA 01752

  
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Steven H. Bullock  
Notary Public  
June 30, 2010

