

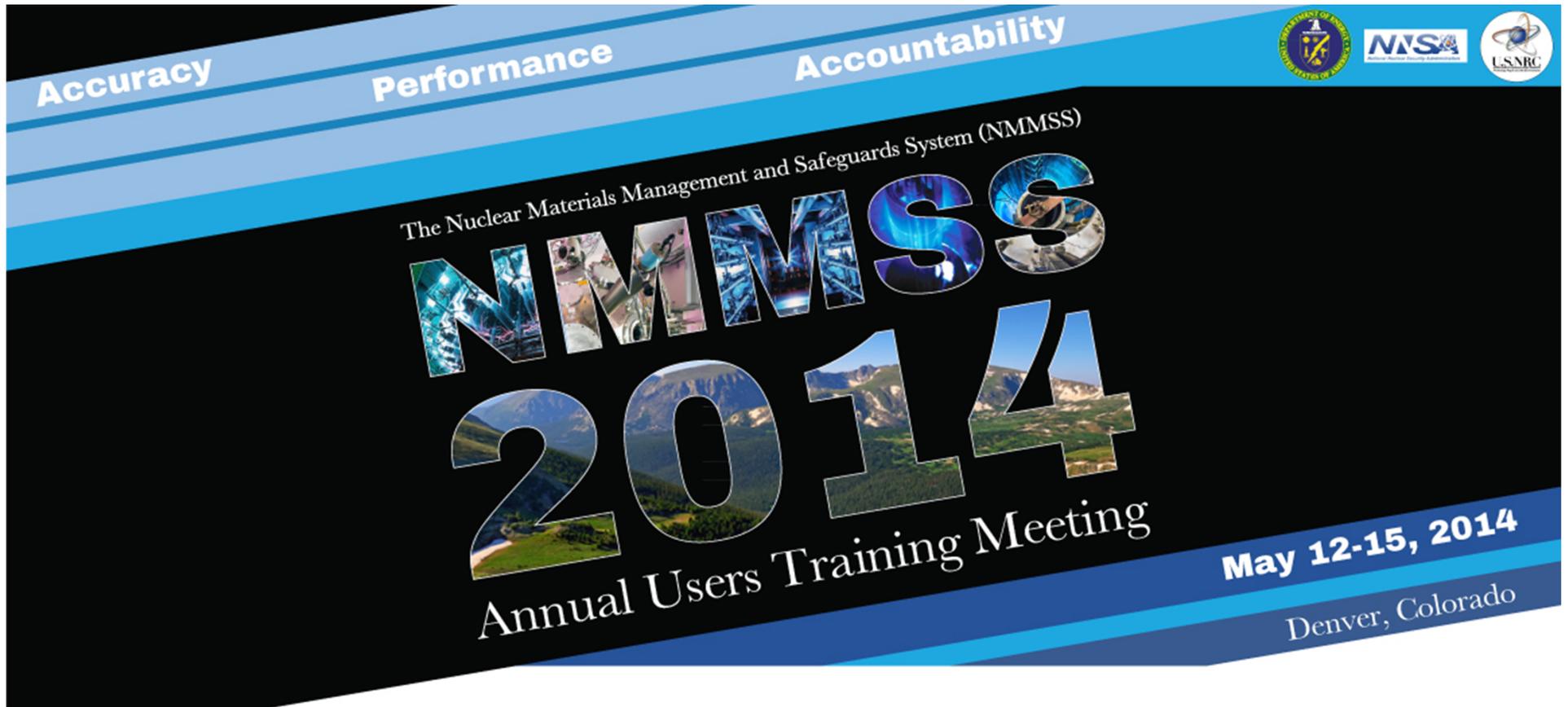
Accuracy Performance Accountability

The Nuclear Materials Management and Safeguards System (NMMSS)

NMMSS
2014

Annual Users Training Meeting

May 12-15, 2014
Denver, Colorado

The banner features a blue and black color scheme. At the top, three blue diagonal bands contain the words 'Accuracy', 'Performance', and 'Accountability'. Below these, the text 'The Nuclear Materials Management and Safeguards System (NMMSS)' is written in white. The main title 'NMMSS 2014' is rendered in large, 3D-style letters filled with images of nuclear reactors and landscapes. Below the title, 'Annual Users Training Meeting' is written in white. At the bottom right, the dates 'May 12-15, 2014' and location 'Denver, Colorado' are displayed in white on a blue background. Logos for the Department of Energy, NNS, and USARC are in the top right corner.

Details on the SFAQ submission to the NRC,
the SFAQ process and expected future actions
involving the SFAQ submission

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SFAQ

- During the 2012 NMMSS meeting, several issues were presented by the licensees. They were:
 - Inspection/Inspector consistency
 - “All” versus “reportable quantity”

SFAQ

- First Step...

- Meeting held with Paul Peduzzi (NRC), Ron Albert (NRC), Andrew Mauer (NEI) and Tom Morello (then CENG) in October of 2012.
- The issues from the 2012 NMMSS meeting were brought to the attention of the NRC.

SFAQ

- Next step....
 - Meeting was held at NRC in April of 2013 to provide update and follow-up to the October discussion.
 - Same individuals involved at both meetings.

SFAQ

- Key Issue: Concept of “all” versus “reportable quantity”:
 - 10CFR74.19(a) states that “each licensee shall keep records showing the receipt, inventory, acquisition, transfer and disposal of all SNM in its possession regardless of its origin or method of acquisition”.
 - NUREG BR-0006 and NUREG BR-0007 both state in their respective Regulatory Authority sections that DOE/NRC Forms (741/742/742C) are required for quantities of SNM 1 gram or more of Uranium-235, U-233, or Plutonium. Reporting of PU-238 is to be to the nearest tenth of one gram of the PU-238 isotope.
 - Why are reportable quantities or greater important to DOE/NRC/IAEA?
 - There is a gap between “all” and “reportable quantity”.

SFAQ

- That gap leads to: Inconsistency in MC&A inspections relative to less than reportable quantity items such as waste streams, laundry, etc.
 - Feedback from NRC indicates that the SNM to be observed/inventoried/etc. is discrete/discernible/tangible – NOT calculated SNM.
 - Resolve via public meeting, letter, SFAQ, position paper, ANSI Standard revision, etc. or some combination of these options?

SFAQ

- More time consuming and intensive process to address word ALL with a value or some other language in 10CFR74.....so.....
- SFAQ method deemed best way to continue discussions and seek resolutions.

SFAQ

- In late November of 2013, the Industry submitted 2 MC&A related SFAQs to the NRC under NEI 05-10.
- The issues involved have been discussed between NRC and Industry for some time, including a panel at the 2013 NMMSS meeting in St. Louis.

SFAQ

- SFAQ 13-01

A gap exists between the word “all” in 10 CFR 74.19(a)(1) and the NUREG BR-0006/0007 required reportable quantities for special nuclear material at power reactors.

10CFR74.19(a)(1) states that “each licensee shall keep records showing the receipt, inventory, acquisition, transfer and disposal of all SNM in its possession regardless of its origin or method of acquisition”. However, NUREG BR-0006 and NUREG BR-0007 both state in their respective Regulatory Authority sections that DOE/NRC Forms (741/742/742C) are required for quantities of SNM 1 gram or more of Uranium-235, U-233, or Plutonium. Reporting of PU-238 is to be to the nearest tenth of one gram of the PU-238 isotope. A review of the Statements of Consideration did not provide additional regulatory perspective in this case.

SFAQ

- SFAQ 13-02

ANSI N15.8-2009, Special Nuclear Material Control and Accounting Systems for Nuclear Power Plants, section 8.3.5, Non-fuel SNM, states, “For non-fuel SNM, the method of physical inventory depends on the method of storage and use. For non-installed components stored in primary containment, administrative procedures and controls shall be established so that records concerning the location and unique identity are accurate when the reactor is at power and verification shall be performed during refueling outages.” What administrative procedures and controls are sufficient to satisfy this?

SFAQ

- In November of 2013, the NRC published a proposed rulemaking on 10CFR74.
 - The proposed rule did not address the issues contained in the SFAQs
 - Comments on the proposed regulation were finalized and sent to NRC in March of 2014
 - Specific comment made on 74.19(a)(1) which concerns the issue of “all” vs. reportable quantity

SFAQ

■ What else?

- The Regulation (and thus the SFAQ resolution) have moved to a new owner (NMSS from NSIR) within the NRC.
- SFAQ resolution progress appears to be stalled.
- Does the NRC want to address the SFAQ issues via the newly proposed Regulation changes? That would be much more robust than the SFAQ process but it does not appear that way since the proposed rule and FRN did not address them.
- Industry's comments on the proposed 10 CFR 74 rule may require the NRC to go back to square one due to the comprehensive nature of the comments. So, if the NRC desires to address the SFAQs via the rule, this may take a very long time.

SFAQ

- In the meantime...

- Some of the issues that drove the SFAQs to be created in the first place appear to have waned.

- several licensees reported that MC&A inspections vary greatly in their breadth of inspection from region to region.
- some regions report that inspectors are concerned with laundry and waste stream SNM while other regions do not report the same concerns.
 - What drove that? Revised Inspector guidance?
 - Can NRC provide that guidance to Industry via either training or some other mechanism?

SFAQ Panel

- Looking to have NRC provide an update on where the two SFAQs stand in their review process.
- Have NRC provide the point of contact who will shepherd the SFAQs.
- Provide a timeline for resolution.

The end result being knowledge of where the two SFAQs currently stand, who will be working on them and when Industry can expect to hear the plan moving forward.

SFAQ

- Industry Recommended Next Steps
 - Receive related guidance from NRC-HQ to the Regions
 - Complete SFAQ 13-01 and 13-02 in the near term per the SFAQ NEI 05-10 process
 - Reflect the SFAQ 13-01 in the rulemaking if it continues