

NIMMSS



2011

Users Annual Training Meeting

San Diego, CA
May 17-19, 2011

Accountability

Accuracy

Compliance

Reporting Challenges of a New Facility

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Reporting Challenges of a New Facility

- URENCO USA Vision, Mission and Values
 - Our Vision
 - We believe the future needs nuclear power to meet the demand for sustainable global energy
 - Our Mission
 - Enriching the future is our commitment, through the global deployment of our nuclear products, services and technology to support sustainable nuclear energy
 - Our Values
 - Safety, Integrity, Flexibility, Development, Profitability

Reporting Challenges of a New Facility

- Types of DOE/NRC forms reported by URENCO USA (UUSA) or YKO
 - 741 Transactions
 - 742 Material Balance Reports
 - 742C Physical Inventory Reports

Reporting Challenges of a New Facility

- Majority of YKO 741 Transactions have been:
 - Receipts from domestic facilities
 - The only domestic facility has been YSP (Honeywell)
 - Receipts from foreign facilities, and the reporting of shipper's data for foreign facilities
 - Primary facility has been RDFN (Cameco)



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Reporting Challenges of a New Facility

- YKO 741 Transactions have included inventory type changes
 - Material Type 81 to 89
 - Material Type 89 to 20
 - Material Type 89 to 10



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Reporting Challenges of a New Facility

- Other 741 Transactions have been:
 - Foreign Obligations
 - Some obligations (such as Kazakhstan, Uzbekistan and South Africa) do not have an agreement with the US
 - Obligation Change of US feed for Canadian feed
 - Transaction with YSP
 - Rounding Adjustment (Transaction Code 65)
 - The 2010 transaction code 65 was cancelled at a later date due to the differences in YKO annual reporting period and NMMSS annual reporting period



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- Receipt of first feed material
 - Pulled 13 kilograms of feed from YSP cylinder received on February 15, 2009
 - Returned remaining feed to YSP on March 4, 2009
 - Used the 13 kilograms to circulate through our test rig
 - This feed will not be used to produce product



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Reporting Challenges of a New Facility

- Volume of receipts (March 25):
 - First feed cylinder to be used for production arrived on site June 13, 2010
 - Since then, YKO has received 109 feed cylinders
 - 51 from YSP
 - 58 from RDFN



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Reporting Challenges of a New Facility

- Volume of inventory type changes (March 22)
 - Connected 12 feed cylinders (MT 81 to MT 89)
 - Disconnected 6 product cylinders (MT 89 to MT 20)
 - Disconnected 9 tails cylinders (MT 89 to MT 10)

Reporting Challenges of a New Facility

- 742 Material Balance Reports and 742C Physical Inventories
 - YKO annual reporting period ends in February each year
 - Day depends upon when inventory is chosen to be performed
 - YKO has had two annual reporting periods
 - February 11, 2010
 - February 1, 2011



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Reporting Challenges of a New Facility

- YKO Electronic Reporting of DOE/NRC Forms
 - XML is YKO preferred format for electronic reporting of data
 - Version 10 of Oxygen XML Editor
 - Difficulties encountered with XML
 - Inexperience with XML data reporting
 - Oversight of detailed information when reading D-24
 - Organizing XML data in correct order (it is not entered in the same order as Form 741)
 - Incorrect language use in some data fields
 - In turn, generated a few error reports from NMMSS

Reporting Challenges of a New Facility

- However, some generated error reports were not due to the fault of YKO reporting
 - Such as reporting Material Type 89 transactions
 - NMMSS system did not recognize MT 89 as a legitimate transaction. As stated in error report: “material type 89 is valid only for uranium enrichment facilities”, hey wait a minute, YKO is a uranium enrichment facility
 - Such as reporting an Action Code “N”
 - Not really sure about the reason behind this error

Reporting Challenges of a New Facility

- How YKO submits DOE/NRC Forms to NMMSS
 - In the beginning
 - YKO original requirements were to submit government correspondence through URENCO USA Licensing Department
 - Then the volume increased
 - This created problems in obtaining signatures for correspondence Licensing had to prepare whenever Form 741s had to be sent to NMMSS

Reporting Challenges of a New Facility

- Solution (Plan A)
 - NMMSS offers a solution to increased volume at YKO
 - Report through NMMSS Web Server
 - URENCO USA Licensing agreed to this solution
 - NMMSS set YKO up with sign-on capability and password
 - Then, NMMSS Web Server went down
 - YKO was able to report twice before the NMMSS Web server was taken down



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Reporting Challenges of a New Facility

- Contingent Solution (Plan B)
 - YKO continues to bypass URENCO USA Licensing (by agreement) and sends reports to NMMSS via United States Postal Service
 - YKO has had one problem so far with USPS
 - YKO was using regular mail

Reporting Challenges of a New Facility

- Example of what went wrong
 - YKO had a Form 741 correction to make within the same NMMSS processing period
 - I was instructed via telephone to enter a Process Code of “C” to replace the data on Form 741
 - With that done, the report was dropped in the mailbox, regular mail
 - Regular mail did not get the YKO Form 741 correction to NMMSS within the same processing period
 - NMMSS operator was aware of the replacement of data, and performed data replacement when YKO Form 741 did not arrive within same processing period
 - Data was duplicated upon late arrival of YKO Form 741



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Reporting Challenges of a New Facility

- Lessons Learned from this example
 - Follow up with NMMSS when time is an issue
 - Overnight all reports from now on
 - Never use the “C” process code to replace data
 - If replacement of data within the same processing period is needed, instruct NMMSS to go ahead and make the change and document the change with pen and ink



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Reporting Challenges of a New Facility

- Challenges of reporting foreign receipt
 - When reporting the shipper side of a Cameco (RDFN) receipt
 - RDFN is an IAEA facility
 - When reporting feed for an IAEA facility, use MT “N” instead of MT “81”



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Reporting Challenges of a New Facility

- Challenges of YKO Annual Reporting Period
 - Experience from 2010 reporting
 - YKO reported 742 and 742C for all material types after our February 11, 2010 annual inventory
 - YKO had a transaction “65” Rounding Adjustment that we reported on February 11, 2010, for MT 20
 - NMMSS closed on September 30, 2010, but the “65” transaction caused MT 20 to be out of balance with YKO
 - YKO “65” transaction became obsolete, so NMMSS suggested we “VOID” it from the system



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Reporting Challenges of a New Facility

- Overcoming YKO Challenges with the help of NMMSS
 - Mary McConnell has been extremely patient in helping YKO fix all the Form 741 error reports
 - John Ballard was of assistance in helping us understand that URENCO Netherlands RIS is really RNED and not WURX
 - Pat Smith has been a great help in balancing the annual 742 and 742C during 2010 reporting period



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Reporting Challenges of a New Facility

- Anticipating Future Challenges
 - YKO has been added to the list as becoming a possible IAEA Facility
 - Legalities are still ongoing, so this is way out in the future of being implemented or not
 - YKO will notify NMMSS if, or when, this is finalized
 - YKO endured the challenges of a classification issue
 - If this issue became classified, then YKO would have to send all NMMSS reports as classified
 - This would then open up a whole new world of reporting challenges
 - The NRC did (at the last minute of our 2011 reporting) give YKO a reprieve



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- Questions?

- YKO MC&A contact information
 - Safeguards Manager – Amy Johnson
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 - Material Control Specialist – Timothy Deines
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