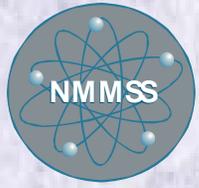


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One-Time Rebaselining of Materials

A NMMSS Perspective

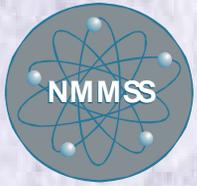
Tina Barnett
NAC International



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Overview

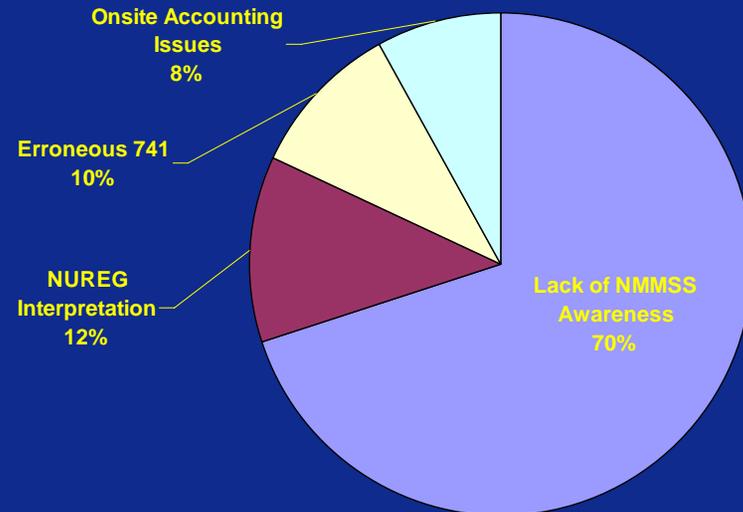
- Lessons Learned
- Task 8 Status, Actions, and Results
- Additional Activities
- Future Considerations

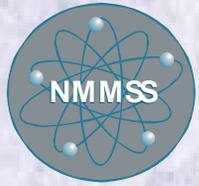


Lessons Learned

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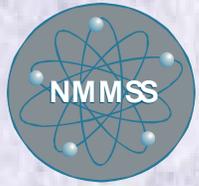
- NMMSS Reporting Issues
 - Lack of NMMSS Awareness by Licensees (70%)
 - NUREG Interpretation (12%)
 - Erroneous Transaction Submittals (10%)
 - Onsite Accounting Issues (8%)





Lack of NMMSS Awareness

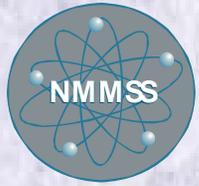
- 200 Licensees not familiar with NMMSS
 - Majority new radiation safety officers
- Several facilities report inventories to state regulators
 - Did not recognize that this did not fulfill the requirements of the NRC Bulletin 2003-04
- NMMSS provided background and assistance to complete NRC Bulletin 2003-04 response and rebaselining



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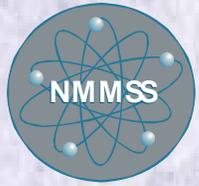
NUREG Interpretation

- Misapplication of reporting thresholds
- Misunderstanding of ownership versus possession
- Reporting responsibility
- Report timing
- NMMSS provided assistance to complete NRC Bulletin 2003-04 response and rebaselining



Erroneous Data Submittals

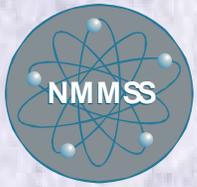
- Erroneous transactions – passed NMMSS edits
 - Incorrect Reporting Identification Symbol (RIS) (example - transposition: ZMW versus ZWM)
 - Units (example - grams versus kilograms)
 - Materials types (example - Pu versus Pu²³⁸)
 - Action dates
- NMMSS provided assistance to correct transactions and complete rebaselining
- Periodic reconciliation would have identified the errors



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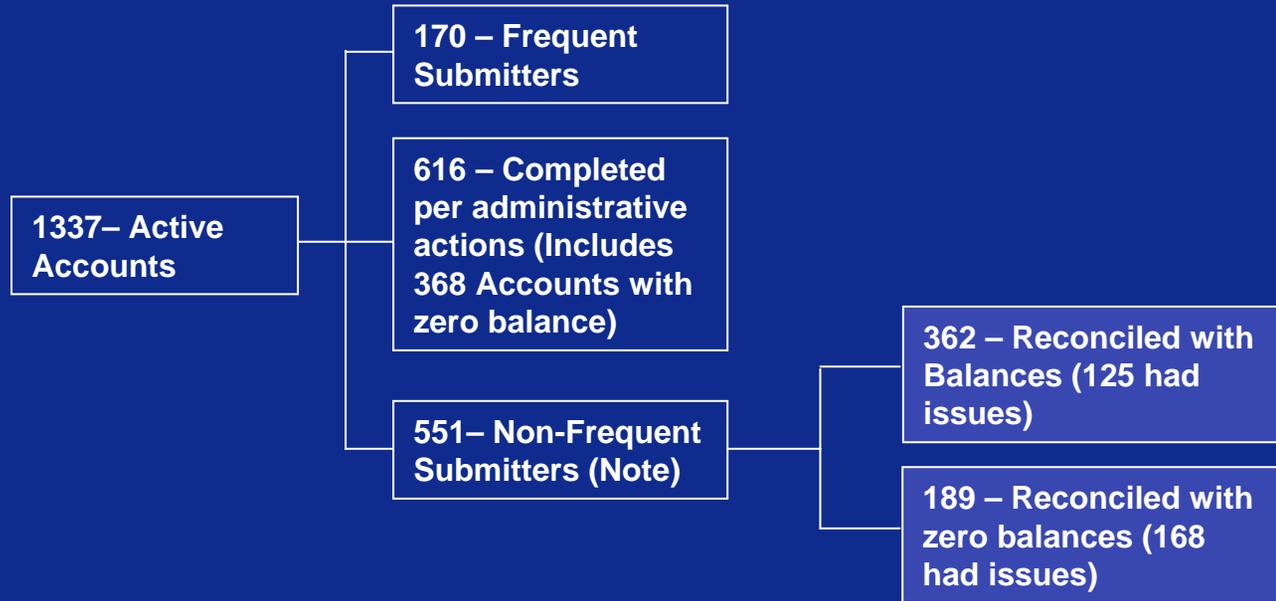
Onsite Accounting Issues

- Onsite adjustments for decay, blending, separation, transmutation, etc.
 - Not reported to NMMSS
- NMMSS provided assistance to submit transactions and complete rebaselining activities
- Periodic reconciliation would have identified the missing transactions

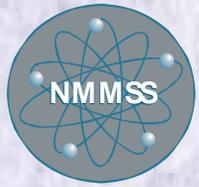


Task 8 Status: Summary of Actions

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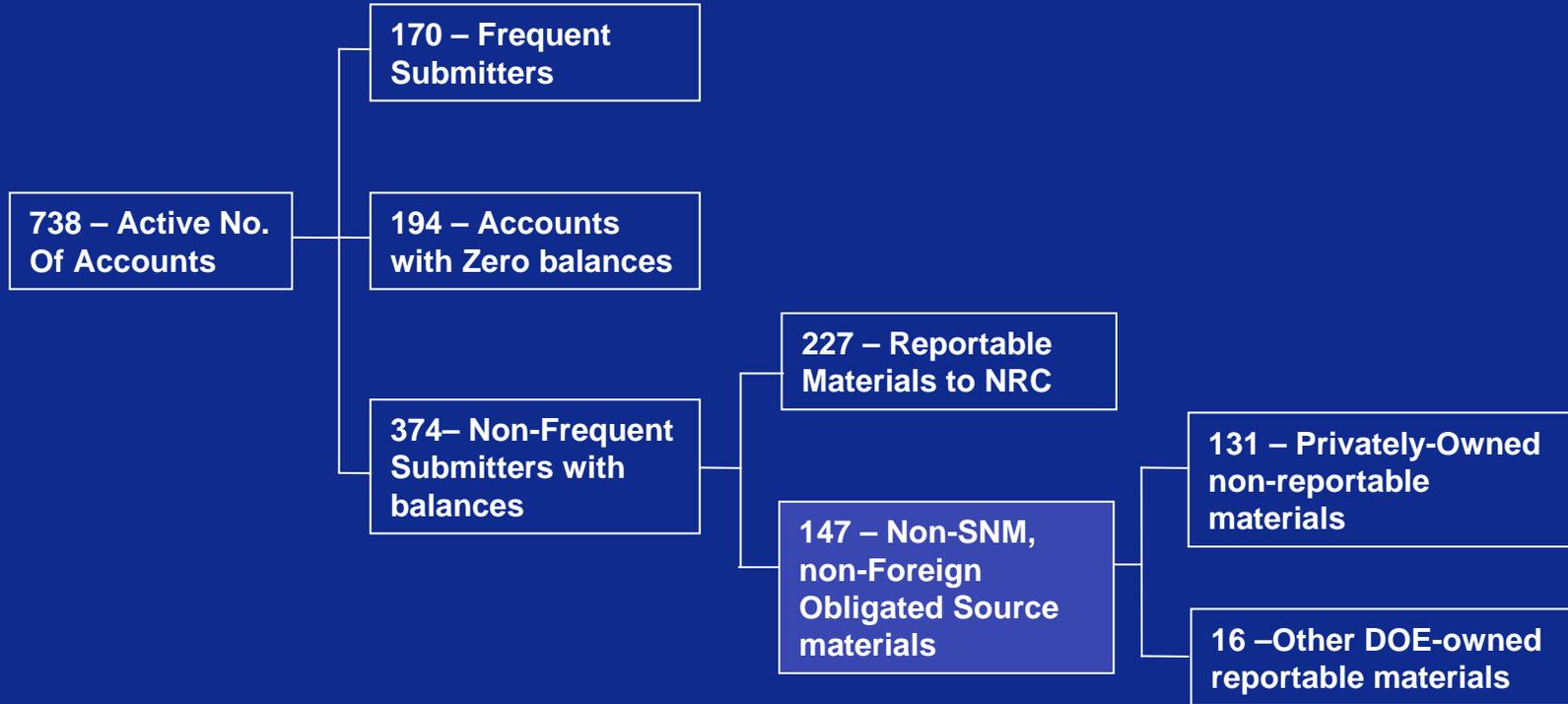


Note – Approximately 300 accounts had issues requiring resolution

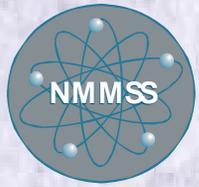


Task 8 Status of Active Accounts: Results as of Sept. 30, 2004

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131 active accounts remain with non-reportable balances after Task 8. Most of remaining negative NMMSS inventory balances are in these accounts



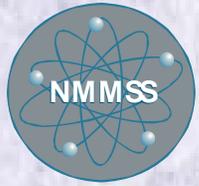
Task Summary: Results

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Number of Licensee RIS Accounts	3Q-2003	1Q-2005
Applicable NMMSS Accounts (XYZ)	1,337	738
NMMSS Accounts (Frequent Submitters)	170	170
NMMSS Accounts Non-Frequent Submitters	619	374
NMMSS Accounts (XYZ) Deactivated with Balances	152	0

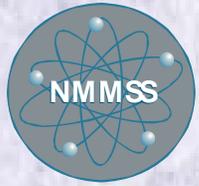
Results:

- About 600 accounts were not needed
- More than 250 accounts had erroneous balances



Negative Balances (Task 8 Materials)

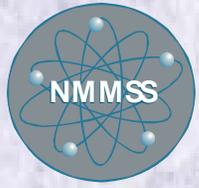
- All negative balances for materials covered under Task 8 (reportable to the NRC) were corrected
- Negative balances for DOE-owned materials were corrected
- Negative balances for privately-owned materials outside Task 8 have not been corrected (70% of all negative balances)



Additional Activities

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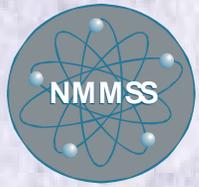
- Material outside scope of Task 8
 - Active licensee accounts with non-reportable material balances
 - Privately-owned non-SNM
 - Privately-owned source with no foreign obligations
 - NRC guidance is expected
- Rebaselining of DOE-owned materials
- Authority Reference Updates (>450)



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Future Considerations

- Consideration is being given to require annual rebaselining of all NRC licensees
 - Material Balance submittal requirement
 - Rebaselining/Reconciliation requirement



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NAC NMMSS Task 8 Contacts

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