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070-00036 ①

JAN 13 1983

SGFF:DRJ
70-36

Combustion Engineering, Inc.
ATTN: Mr. H. Eskridge, Supervisor
Nuclear Licensing Safety
and Accountability
Route 21-A
Hematite, Missouri 63047

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Gentlemen;

The purpose of this letter is to clarify safeguards licensing policy with respect to the inventory requirements of SNM contained in liquid and solid waste materials stored at a licensee's site. There has been some question as to whether waste materials (primarily liquid waste) need to be stored within an MBA/ICA. Additionally, we have required solid waste containers to remain as part of the book inventory and to be verified at the time of physical inventory until they are shipped to burial, while liquid waste stored on site was not regarded as a component of inventory.

To clarify our safeguards licensing criteria relative to waste materials, the following points are being provided for your information.

- o Liquid and solid waste materials that have been measured and declared as waste discards, but remain on site awaiting final off-site disposition, need not be stored within an ICA or MBA provided the arrangements satisfy any relevant physical protection, health-safety, and/or international requirements.
- o Waste discards (both solid and liquid) stored on site need not be subject to the inventory requirements of 10 CFR 70.51(d), (e), or (f), provided such waste has been formally transferred to a holding account (the waste material has been transferred from the accounting book record to a site holding account record) using a NRC Form 741.
- o Waste materials (solid or liquid) which are stored on site, but which have not been declared as discards and transferred to a holding account, must be located within an MBA or ICA and shall be included within the material balances obtained by physical inventories. However, liquid waste stored in lagoons, ponds, etc, need not be measured at the time of physical inventory, provided the inventory listing value for such liquid waste is based on the summation of waste tank accountability batch measurements discharged to the lagoon, pond, etc. minus any measured quantity of SNM removed from the lagoon.

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Although the above criteria does not preclude the storage of holding account waste discards within an ICA or MBA, we suggest that they not be stored in such areas, if possible, so as to avoid confusion over which items or materials must be inventoried.

Licenseses desiring to take advantage of the criteria stated above should submit a request for an exception to the requirments of 10 CFR 70.51(e)(2) or 70.51(d) as they pertain to waste discards placed in holding accounts, and/or an exception from 70.51(f)(3)(ii) with respect to liquid waste stored in ponds or lagoons that is not part of a holding account. Appropriate revisions to the FNMC Plan should be submitted as part of your request.

Additionally, licenseses who wish to store holding account waste discard material in an area not designated as an MBA or ICA, and who currently do not have a statement to this effect in their FNMC Plan, should submit a revision to their Plan.

All Plan revisions associated with any of the above mentioned criteria would not qualify as 10 CFR 70.32(c) changes. It has been determined that all such requests would fall within the "Administrative" category for licensing fee purposes.

Sincerely,

C. N. Smith, Acting Chief
Fuel Facility Safeguards
Licensing Branch
Division of Safeguards, NRCSS

OFFICE	SGFF	SGFF					
USERNAME	DRJoy:ah	CNSmith					
DATE	1/10/83	1/13/83					