

Proposed Rulemaking excerpt:

Currently, licensees are required by 10 CFR 74.15(a) to report to the NMMSS whenever they transfer or receive one gram or more of SNM. The proposed revision would add a requirement that licensees must also report to the NMMSS whenever it makes an on-site adjustment to the SNM inventory involving a quantity of one gram or more SNM. The inventory adjustments may be due to decay, or normal operational losses. Domestic MC&A safeguards would be enhanced by this change because the NRC inspection staff would be aware of possible inventory anomalies sooner and NMMSS generated inventories would more accurately reflect actual facility inventory values between reconciliation periods. Thus, required reporting of these adjustments as they are generated would improve the accuracy of the NMMSS database.

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Response:

This new requirement is not clear. The present reporting frequency requirement is annual (within 12 months of previous report), and is associated with the annual physical inventory. Many licensees make frequent adjustments to their inventory without performing a complete physical inventory and annual report. Is the intent of this rulemaking to require report submittal every time SNM inventory is adjusted? Is this based on the computer database calculation of the decay of the SNM? Taken to a ridiculous extreme, this could be interpreted to require a report every time one gram of SNM decayed to another form. If "normal operational losses" was interpreted to include burnup in the reactor core, the new requirement might imply reporting many times per second.

It appears that NRC desires a report every time the physical inventory is performed, and the book inventory is adjusted to match. If so, this should be more plainly stated. Decay should have nothing to do with the report frequency.

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**From:** Carol Gallagher  
**To:** SECY  
**Date:** Fri, Feb 23, 2007 9:52 AM  
**Subject:** Comment letter on Regulatory Improvements to the Nuclear Materials Management and Safeguards System

Attached for docketing is a comment letter on the above noted proposed rule from Damon Bryson that I received via the rulemaking website on 2/22/07.

Carol

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**Subject:** Comment letter on Regulatory Improvements to the Nuclear Materials Management and Safeguards System  
**Creation Date** Fri, Feb 23, 2007 9:52 AM  
**From:** Carol Gallagher  
**Created By:** CAG@nrc.gov

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