DOCKET: 70-27

LICENSEE: BWX Technologies, Inc. Nuclear Products Division Lynchburg, VA

SUBJECT: SAFEGUARDS EVALUATION REPORT: SUBMITTAL DATED APRIL 14, 2004, REVISION TO HIGH ENRICHED URANIUM FUNDAMENTAL NUCLEAR MATERIAL CONTROL PLAN

BACKGROUND

By letter dated April 14, 2004, BWX Technologies, Inc., (BWXT) submitted various changes to three chapters of its high enriched uranium (HEU) Fundamental Nuclear Material Control (FNMC) Plan.

All other revisions were mainly administrative in nature or provided clarification and did not affect the current accountability controls.

DISCUSSION

Section 1 - Process Monitoring

- Updated and provided a description of the
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Section 3 - Alarm Resolution

The item control system was updated to reflect computer automation and elimination of the use of storage cards.

Section 4 - Quality Assurance and Accounting

- Revised the critical Material Control and Accounting (MC&A) procedures list for process monitoring.
- Modified the wording pertaining to the batch size for sampling of **second second** to be determined by an engineering study.
- Added a description of a methodology for sampling that will be used as the primary sampling method.

- Removed statements pertaining to the use of a redundant system that is not required, because the inventory file and records file provide adequate redundancy for the MC&A system.
- Replaced the word "form" with the actual form number for inventory and material transaction reporting.
- Removed the statement that the Nuclear Material Transfer Form E4-4 used for physical internal transfers of SNM requires the signature of the material balance area and/or item control area custodian, because this form is now computer generated and contains electronic signatures.
- Changed receipt measurement reporting requirements to be consistent with NUREG/BR-006, "Instructions for Completing Nuclear Material Transaction Reports."

The staff reviewed BWXT's submitted modifications in accordance with guidance contained in NUREG-1280, Rev. 1, "Standard Format and Content Acceptance Criteria for the MC&A Reform Amendment." Based on its review, the staff has determined that the proposed changes to its FNMC Plan are adequate and continue to provide an effective MC&A program at BWXT.

ENVIRONMENTAL REVIEW

The staff has determined that the revision of the facility's FNMC Plan involves the safeguards plans and material accountability which are categorically excluded from the requirements to prepare a site-specific environmental assessment. Therefore, in accordance with 10 CFR 51.22(c)(12), neither an environmental assessment nor an environmental impact statement is warranted for this action.

CONCLUSION

The staff concludes that the licensee's revised HEU FNMC Plan contains appropriate and necessary commitments to satisfy applicable MC&A regulations specified in 10 CFR 74.51-59, and that approval of the submitted plan revisions do not reduce the effectiveness of the BWXT safeguards program. Thus, the existing Safeguards License Condition SG-5.1 is being revised to update the revised HEU FNMC Plan.

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