



Admitted: 03/07/2012
Rejected:

Withdrawn:
Stricken:

RAS R-251

APP000032
Jan. 24, 2012

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(Sensitive Unclassified Non-Safeguards Information)
Withhold Under 10 C.F.R. 2.390

4. QUALITY ASSURANCE

4.1 MANAGEMENT STRUCTURE

The management structure and the functional allocation of tasks for SSNM control and accounting are identified. The relationship of SSNM material control and accounting functions within the organization are described in order to denote the appropriate separation of functional responsibilities.

4.1.1 Organization

Affirmations

DOCKETED

January 30, 2012 (2:00 p.m.)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

- *The overall responsibility for the MC&A system is assigned to a management position that provides separation from production responsibilities or any other responsibilities that may give rise to a conflict of interest.*
- *The responsibility for each MC&A function is assigned to a specific position in the organization in a way that key functions are cross-checked.*
- *The MC&A organizational design will ensure that no individual may have responsibility and control of both MC&A and physical protection functions unless independent cross-checks are in place to preclude defeat of the overall safeguards system.*

Prior to the receipt of SSNM at the MFFF, the MFFF organizational structure, including position summaries describing the policies, procedures, duties, responsibilities, and authorities associated with each position, will be provided to the NRC. A graphic representation of the management structure will be presented in Annex D.4.1. The MFFF management structure exhibits at least the following attributes:

- The overall planning, coordination, and administration of the MC&A functions is vested in a single individual at an organizational level that is sufficient to ensure independence of action and objectivity of decisions.
- The assignment of MC&A functions in the MFFF organization provides a separation of functions so that the activities of one individual or organizational unit serve as controls over and checks of the activities of other individuals or organizational units.

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Template Rev: 05-8

DS-03

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- The critical MC&A functions and activities are documented in written procedures. Procedures that pertain only to MC&A activities shall require at least the signature of the MC&A Manager. MC&A or related procedures affecting and/or generated by other departments shall require at least the signatures of the MC&A Manager and the department managers of the affected and/or user departments. Appropriate management signatures shall denote adequate review and approval, and procedures shall not be implemented prior to the required signatures.
- The critical MC&A procedures shall, as a minimum, address (1) the establishment of basic MC&A policies; (2) measurement requirements and methodologies; (3) detecting the loss of a goal quantity; (4) alarm resolution activities; (5) performance of physical inventories; (6) determination of inventory and shipper/receiver differences; (7) establishment of measurement control policies; and (8) determination of measurement uncertainties and the standard error of inventory difference.
- A critical MC&A procedure will be revised and reissued (with a new date and revision number) whenever existing MC&A related activities are modified, or new MC&A related activities implemented, to which the procedure pertains. As a minimum, each critical MC&A procedure will be reviewed for current accuracy and applicability at intervals no greater than 24 months, and revised and reissued if necessary. As a minimum, each critical MC&A procedure will be reissued (with a new date and revision number) at an interval no greater than 48 months since last issued.

4.1.2 Policies and Procedures

Affirmation

The management structure and the critical MC&A policies and procedures are documented and provisions are made for review and approval prior to implementation.

Procedures are developed as specified in Section 4.9 of this Plan.

A listing (by title and procedure number) of the procedures deemed to be critical to the effectiveness of the MC&A system is provided:

- Calculating Standard Error of the Inventory Difference (Number TBD)
- Calibration of Measurement Systems (Number TBD)
- Conduct of Physical Inventory (Number TBD)
- Control of Tamper-Indicating Seals (Number TBD)

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