

# **Implementation of the U.S. AP at NRC and Agreement State Licensees**

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# U.S. Additional Protocol Basics

- The U.S. AP was signed on June 12, 1998
  - INFCIRC/288 add. 1
  - Identical to the Model Additional Protocol except for the inclusion of a national security exclusion
- Entry into force: January 6, 2009
- Initial declaration: July 3, 2009
- As of August 31 2012:
  - **4 annual declarations**
  - **14 quarterly export reports**

# U.S. Additional Protocol Basics

- NRC is responsible for implementing the U.S. AP at NRC licensees (in most cases)
  - Article 2 annual reporting
  - Quarterly exports of Annex II items
  - 10 Year Fuel Cycle Plan (2.a.x) updates for NRC licensees
- U.S. Government divides AP reporting responsibilities between three core Agencies:
  - Department of Energy
  - **Nuclear Regulatory Commission**
  - Department of Commerce

# U.S. Additional Protocol Basics

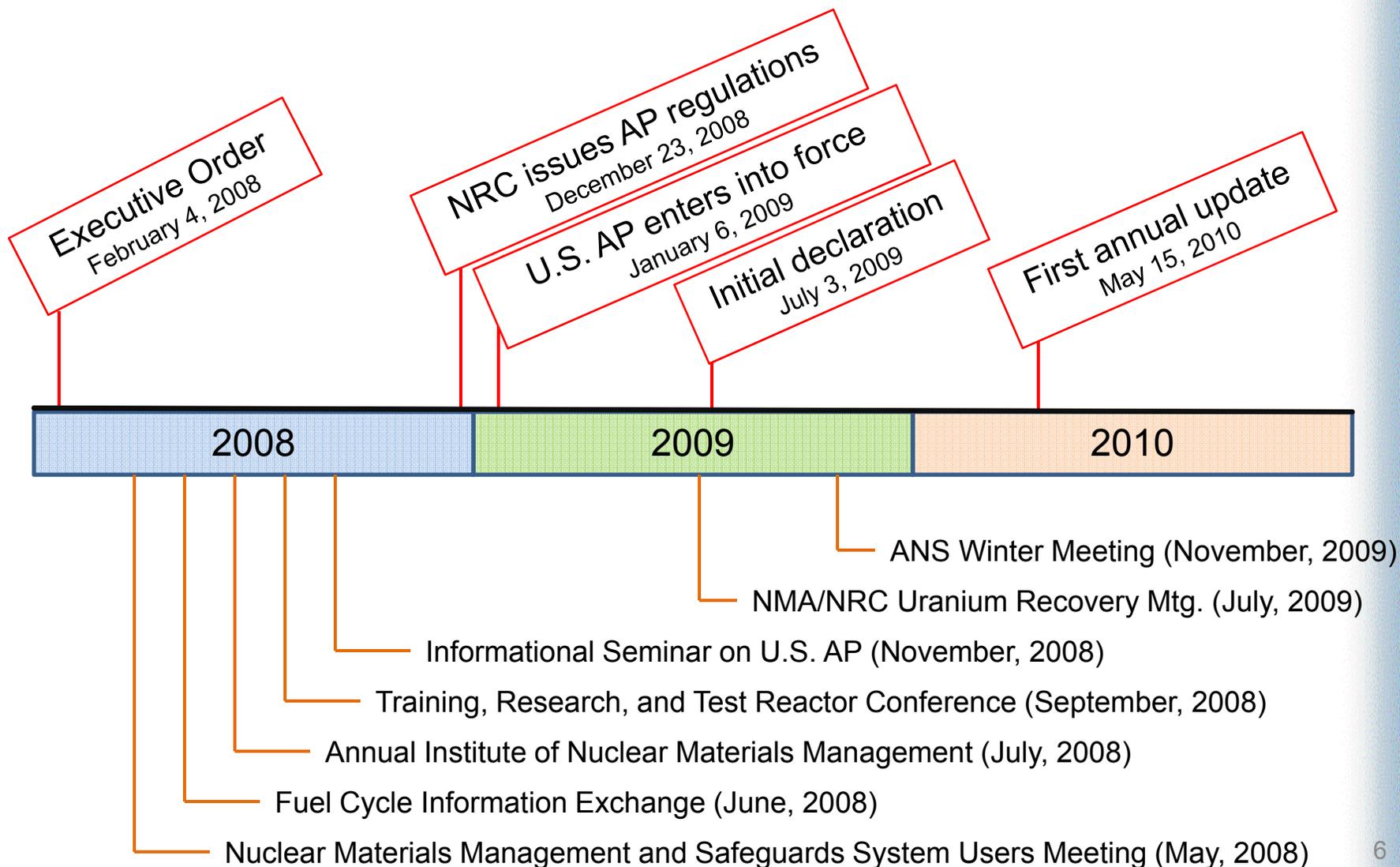
## Total Number of Entries on U.S. AP Declaration

Article	Initial	CY09	CY10	CY11
2.a.i	128	201	241	257
2.a.iii	11	11	11	11
2.a.iv	19	19	21	23
2.a.v	33	45	46	50
2.a.vi	1	3	3	4
2.a.x	70	105	134	121
2.b.i	2	2	2	5

# Early NRC Outreach

- NRC needed to inform as many stakeholders as possible in a short amount of time
- Focus on raising awareness of the AP and associated requirements:
  - What is the Additional Protocol?
  - What are the requirements of the Additional Protocol?
  - How will the NRC gather this information?
  - How will this impact licensees?
- Targeted popular industry conferences and events
  - Relevant to nuclear industry
- Close coordination with Department of Commerce

# Early NRC Outreach



# Complementary Access

- After initial declaration, focus shifted to complementary access
  - USG coordination
  - What does complementary access mean to the industry?
  - Roles and responsibilities
  - Waiting game...
- Initial complementary accesses:
  - AREVA NP Inc., Lynchburg VA (LEU fuel fabrication)
  - Cabot Supermetals, Boyertown PA (tantalum extraction)
- Exercises were successful however challenges will always exist:
  - Internal coordination
  - Potential difficulty in reaching remote locations within 24 hours
  - Communication, Communication, Communication

# Recent NRC Outreach

What do we need to do?



How do we do it?



Is it correct?



Is it complete?

# Recent NRC Outreach

- Change in thinking has led to a change in outreach
  - Move towards gap analysis and targeted outreach
- NRC is required to function in a non-traditional role
  - Facilitator vs. Regulator
- Growing emphasis on how to create a better product that is correct and complete
  - What is good enough?
  - Working with budgetary and timing constraints
- How do you look for something without knowing what you're looking for?

# Recent NRC Outreach

- Some examples of recent NRC outreach:
  - Constant analysis of data to ensure correct **and complete**
  - Issued short clarifications of certain requirements (e.g., 2.a.vi)
  - Performed mock complementary accesses
    - Westinghouse Columbia
  - Worked with the industry to revise how some data (production and location) is provided
  - Collaborate with Dept. of Commerce to ensure a more complete AP declaration
  - Performed site visits to discuss AP and CA activities
    - White Mesa uranium mill

# Looking Forward

- How can the NRC better integrate AP requirements and activities with existing functions?
  - Incorporate AP data review and discussions into existing NRC inspections
  - Work with industry and professional groups
  - Develop better lines of communication with Agreement States
- Can the NRC communicate with the industry better and clarify the requirements/expectations?
  - Key to ensuring your declaration is correct and complete

# Looking Forward

- Data Management will become increasingly important as larger quantities of data are acquired!
  - How does this impact the U.S. Government?
- What can the U.S. Government, or the NRC, do now to better prepare for future challenges?
  - Move towards all electronic storage, submission, analysis, etc...
  - Bring together all Safeguards data into a single platform?
- How can you use existing or planned systems to help facilitate knowledge management?
  - If you don't write it down, it doesn't exist

# Conclusion

- NRC is working to successfully implement the U.S. AP in addition to improving the process
- Cooperation and communication with the industry is critical to success
- **Industry is encouraged to contact the NRC to discuss concerns, questions, or request assistance**

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