

MFFFPEm Resource

From: MFFFHearingFile Resource
Sent: Friday, November 16, 2012 1:19 PM
To: MFFFPEm Resource
Subject: FW: draft RAIs on MCA submittals
Attachments: Draft RAI Questions for MOX Services FNMCP 10-15-2012.docx

From: Tiktinsky, David
Sent: Tuesday, November 13, 2012 1:34 PM
To: Gwyn, Dealis W.
Cc: MFFFHearingFile Resource; Morrissey, Kevin
Subject: draft RAIs on MCA submittals

Please see attached questions for discussion.

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Subject: FW: draft RAIs on MCA submittals
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Here is a preliminary list of RAI questions for the MOX Services' FNMCP changes in the October 15, 2012, submittals:

1) Section 2, Item Monitoring, 2nd paragraph, last sentence:

The licensee stated that "this operational verification process has been proceduralized". The newly developed procedure "SSNM Item Identity and Location Data Verification Procedure," MFFF-APM-MC-SOP-S-67011, Rev. 0, should be referenced in this section of the FNMCP and should be also in the listing of all MC&A critical procedures in Section 4.1.2, Policies and Procedures.

2) Section 2.8.3.1, Category IA Materials (requires detection of loss within 30 days), 3rd paragraph:

The description in this newly proposed paragraph does not clearly address and/or does not appear to be consistent with the Statement of Position described in the MOX Services' Supplemental Statement of Position on Contentions 9 and 11 and Response to Surreply (Document Component 002) with respect to the following item verification activities:

"Physical retrieval of individual items, reading of unique item identifiers, and confirmation that the as-read identity and location of items corresponds to identity and location information retained by PLCs."

3) Section 2.8.3.2, Category IB Materials (requires detection of loss within 60 days), 3rd paragraph:

Same comment as RAI #2

4) "SSNM Item Identity and Location Data Verification Procedure," MFFF-APM-MC-SOP-S-67011, Rev. 0:

The procedure does not clearly address the following aspects of the data verification process:

- when the verification sample size number will be obtained (will the licensee always meet the 99% confidence level of detecting a 3% defect rate if the verification sample size is generated based on beginning inventory?)
- how to obtain additional items to be verified if the process operation does not achieve the requisite verification size within the 30-day period
- whether the additional items to be verified are selected from the inventory at the beginning date or from the inventory on the date the intermediate report was generated
- whether multiple process movements on a single item count as separate verifications to meet the verification sample size
- when the item tests will be physically performed