

MFFFPEm Resource

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

From: Tiktinsky, David
Sent: Friday, November 16, 2012 1:04 PM
To: dyates@moxproject.com; Gwyn, Dealis W.
Cc: MFFFHearingFile Resource; Morrissey, Kevin; Ani, Suzanne; Pham, Tom; Tuttle, Glenn; Silva, Patricia; Hair, Christopher; Klukan, Brett
Subject: RAIs on MOX FNMCP dated October 15, 2012

The NRC staff has reviewed the FNMCP revision dated 10/15/2012. Since the review of this document is related to the licensing hearing responses entitled "Statement of Position on Contention 9 and 11 and Response to Surreply", dated 10/15/2012 and the tight timeframes agreed to by the parties to respond to the submittals, we are enclosing our requests for additional information on the document via this email.

In order for the schedule not to be impacted, we request that your responses to these RAIs, including change pages, be submitted to the NRC by December 5, 2012. If you have any questions, please let me know.

Hearing Identifier: MixedOxideFuelFabricationFacility_Public
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NRC staff Requests for Additional Information on the MOX Services' Fundamental Nuclear Material Control Plan revisions dated October 15, 2012

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

The Certificate Holder 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, should be referenced in this section of the FNMCP and should be also in the listing of all Material Control and Accounting (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:

Revise the description in this newly proposed paragraph to be more consistent with the Statement of Position described in the MOX Services' Supplemental Statement of Position on Contentions 9 and 11, dated October 15, 2012 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:

Revise the procedure to clearly address the following aspects of the data verification process:

- 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