

National Organization of Test, Research,
and Training Reactors



Part 73 Rulemaking Development 2015 TRTR Conference

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Overview

- Rulemaking Activities
- Protection Approach
- RTR Protection
- Regulatory Basis Concerns

Rulemaking Activities

- Final Regulatory Basis (Jan 2015)
- Preliminary Language
 - Category III (Sept 2015)
 - Category I (Jan 2016)
 - Category II (March 2016)
- Public Meeting (March/April 2016)
- Provide Propose Rule to Commission (Winter 2016/Spring 2017)
- Public Outreach on Proposed Rule (TBD)
- Issue Final Rule (TBD)

Protection Approach

- Graded Protective Strategy
- Consider Life-cycle of Fuel
- Consider Theft and Sabotage
- Consider Material Attractiveness
 - *Dilution factor* means the weight of uranium 235, uranium-233 and plutonium divided by the total weight of the SNM material and non-SNM materials which are not mechanically separable from the SNM) for solids
 - *Moderately dilute SNM* means material with a dilution factor equal to or greater than 1 percent but less than 20 percent for uranium-235.

RTR Protection

- HEU Fuel (Category II Quantity)
 - Fresh Fuel (Theft Target) - Category II – MD
 - Irradiated Fuel (Sabotage Target) - Category II – MD
 - Fuel greater than 5000 R/hr at one meter would not be counted in determining the protection category
 - Greater than 2 MW (Facility Sabotage Target)

RTR Protection

- LEU Fuel (Category II Quantity)
 - Fresh Fuel (Theft Target) - Category II – MD
 - Irradiated Fuel (Theft/Sabotage Target) - Category II – MD
 - Greater than 2 MW (Facility Sabotage Target)
- LEU Fuel (Category III Quantity)
 - Fresh Fuel (Theft Target) - Category III
 - Irradiated Fuel (Sabotage Target) - Category III
 - Greater than 2 MW (Facility Sabotage Target)

Regulatory Basis Concerns

- Nomenclature
- RTR Fuel Risk
- Security Organization
 - Management system provides clear command and control
 - Defines roles, duties, responsibilities, and actions
- Requirements
 - Alarm Stations
 - Searches
 - On-site assessment

Questions??