

February 26, 2016

Ms. Melissa Forest
Safeguards Manager
URENCO USA
PO Box 1789
Eunice, NM 88231

SUBJECT: U.S. Nuclear Regulatory Commission Clarification of International Atomic Energy Agency's Guidance on Use of Measurement Basis Codes and Recommended Path Forward

Dear Ms. Forest:

This letter provides clarification regarding recent comments the U.S. Nuclear Regulatory Commission (NRC) has received from the International Atomic Energy Agency (IAEA) regarding URENCO USA's use of measurement basis (MB) codes in their inventory change reports (ICRs).

The IAEA has indicated to the United States that the reporting for the URENCO USA facility has incorrectly used the 'L' and 'T' MB codes when reporting ICRs. Specifically, the IAEA stated that the measurement basis code consists of one of the following letters (Code 10, label 469):

N - if batch data are based on measurements made at another material balance area (MBA);

L - if batch data are based on measurements made at another MBA and have been reported for the present MBA in a preceding ICR or PIL;

M - if the batch data are based on fresh measurements made at the MBA; and

T - if the batch data are based on measurements made at the present MBA and have been reported in a preceding ICR or PIL; the measurements have not been repeated;

Consequently, to correct this issue, the NRC requests URENCO USA:

- 1) use 'L' or 'T' if the batch is already part of a MBA inventory reported in a preceding ICR or PIL;
- 2) use the 'L' or 'T' code when reporting shipment of material from an MBA, and
- 3) use 'M' or 'N' for reporting receipt of material into an MBA since this is the first time the material is being reported by the MBA.

M. Forest

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The NRC recognizes that URENCO USA may need to modify their software programming to satisfy Code 10 reporting requirements pertaining to MB codes for each of their material balance areas. By this letter, the NRC requests that URENCO USA provide the time frame to make and implement the necessary modifications to its software programming to correctly report the MB codes.

If you have any questions regarding our comments on the proposed resolution, please contact Mirabelle Shoemaker by telephone at (301)-415-7363 or via e-mail at Mirabelle.Shoemaker@nrc.gov or David Hanks at (301)-415-7405 or via email at David.Hanks@nrc.gov.

Sincerely,

/RA/

Peter Habighorst, Chief
Material Control and Accounting Branch
Division of Fuel Cycle Safety, Safeguards
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

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Peter Habighorst, Chief
 Material Control and Accounting Branch
 Division of Fuel Cycle Safety, Safeguards
 and Environmental Review
 Office of Nuclear Material Safety
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