



BWX Technologies, Inc.

January 3, 2017  
16-115

ATTN: Document Control Desk  
Director, Division of Fuel Cycle Safety, Safeguards, & Environmental Review  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

- References:
- (1) License No. SNM-42, Docket 70-27
  - (2) Letter dated October 18, 2011, B&W NOG (Cole) to NRC (Document Control Desk), Process Control Limits
  - (3) Letter dated December 19, 2011, Baker (NRC) to B.Cole (B&W NOG), Babcock & Wilcox Nuclear Operations Group, Inc., - Process Control Limits
  - (4) Email dated January 09, 2012, Baker (NRC) to B.Cole (B&W NOG), Clarification Regarding Letter Dated December 19, 2011.

Subject: Process Control Limits

Dear Sir or Madam:

On February 15, 2000, BWXT Nuclear Operations Group – Lynchburg (BWXT NOG-L) received a confirmatory order issued by the U.S. Nuclear Regulatory Commission (NRC) requiring the implementation of additional physical protection measures. BWXT NOG-L assumed responsibility for meeting this order with the approved SNM-42 license transfer in 2008 (reference TAC L32657). A section of this order required that BWXT NOG-L take special measures to protect specific material types with the implementation of Process Control Limits (PCL). A table in the confirmatory order listed the specific material types that should be placed under PCL controls. These specific material types along with their limits were also placed into BWXT NOG-L's Fundamental Nuclear Materials Control (FNMC) plan that is required by 10 CFR 74.51 and reviewed and approved by the NRC. Type 3 and Type 5 fuels are specifically listed as being under PCL controls. BWXT NOG-L recently started receiving Type 7N fuel which is different in composition from the Type 3 and Type 5 fuels. Based on the confirmatory order and the FNMC plan, BWXT NOG-L concluded that type 7N material does not fall under PCL controls. Similar to letters provided in References 3 and 4 regarding 4N material, BWXT NOG-L requests that the NRC review and provide concurrence with this conclusion.

If you have questions or require additional information, please contact Chris Terry, Manager of Licensing and Safety Analysis, at [cterry@bwxt.com](mailto:cterry@bwxt.com), or 434-522-5202.

NMS22

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Joel Burch', with a long horizontal flourish extending to the right.

B. Joel Burch  
Vice President and General Manager  
BWXT Nuclear Operations Group, Inc. - Lynchburg

cc: NRC, Region II  
NRC, Resident Inspector  
NRC, M. Baker, Senior Project Manager