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BWX Technologies, Inc.

December 7, 2017  
17-099

Attn: Document Control Desk  
Director, Office of Nuclear Material Safety and Safeguards  
U.S Nuclear Regulatory Commission  
Washington D.C. 20555-0001

Reference: License No. SNM-42, Docket 70-27

Subject: Revision to the Fundamental Nuclear Material Control Plan

Dear Sir or Madam:

BWXT Nuclear Operations Group, Inc., Lynchburg ( BWXT NOG-L), forwards the enclosed October 18, 2017, Revision to the Fundamental Nuclear Material Control Plan (FNMCP). Enclosure 1 to this letter provides FNMCP 2017 Highlights which includes the list of changes to the plan. Enclosure 2 includes the revised copy of the FNMCP with the changes noted in red. Enclosure 3 provides the final copy of the revised FNMCP.

The enclosures contain Confidential Restricted Data and as such must be protected in accordance with 10 CFR 95.

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

Sincerely,

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

Enclosures

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

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Enclosure 1

Classified by: Benny Cole 12/7/17

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## FUNDAMENTAL NUCLEAR MATERIAL CONTROL PLAN

### 2017 HIGHLIGHTS

Section	Changes
All	<p>This revision of the FNMC Plan incorporated a large number of administrative changes such as the following:</p> <ol style="list-style-type: none"><li>1. The MFP process is no longer active and is being removed. Practices &amp; referenced procedures related to MFP that are no longer in place were removed.</li><li>2. The Fuel Reclamation process is no longer active and is being removed. Practices &amp; referenced procedures related to MFP that are no longer in place were removed.</li><li>3. Formatting, spelling and grammatical errors were made as necessary.</li></ol>
<b>Chapter 1.0</b>	<b>Abrupt Loss Detection</b>
1.1.1.3	Identification of all inputs for RTR process units.
1.1.1.6	A note was added to provide further explanation for vacuum residues produced.
<b>Chapter 2.0</b>	<b>Item Monitoring</b>
2.5.1	Bay 15A is now a storage location for RTR material. In accordance with NCS requirements.
2.8.17	Per discussion with NRC representatives on 10/3/2017, a statement was added to clarify reporting requirements for missing items.
<b>Chapter 3.0</b>	<b>Alarm Resolution</b>
3.3.1.1	Clarification added for container data comparison, and for location updating.
<b>Chapter 4.0</b>	<b>Quality Assurance</b>
4.1.1	The lead person position no longer exists. NMC-MC will retain responsibilities.
4.3.2	Update to the table to correct errors and reflect current processes.

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- 4.4.2.3 Wording inserted to include the possibility of the proposed automated pharmacy. This possibility will be evaluated through the Safety Evaluation Request (SER) process to ensure no potential degradation in effectiveness of accountability and process measurement systems.
- 4.5.1.4 Handling of Tamper Indicating Devices (TIDs) clarified.
- 4.5.1.5 Handling of TIDs clarified.
- 4.5.1.5 Position title clarified.
- 4.5.1.7 A clause was added to give the possibility of manually comparing inventory to the electronic pre-listing.
- 4.5.1.7 Due to utilization of operational personnel on inventory teams, the switching of responsibilities periodically for team members was removed.
- 4.5.2.1 Only MC&A data needs to be verified to complete inventory, some data is non-MC&A related.
- 4.5.2.5 Clarification for bar code scanning during inventory, and for being able to perform a manual inventory if needed.
- 4.6.1 Job number references were removed. PACs are not referred to as job numbers.
- 4.11 The requirement for annual training was removed for MBA Custodians per NMC training requirements.

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Enclosure 2

Derived from: DOE-DOD Classification Guide  
CG-RN-1 Revision 3 dtd February 1996

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