

SAFETY EVALUATION REPORT

DOCKET: 70-1227

LICENSEE: Framatome Inc.
2101 Horn Rapids Road
Richland, WA 99354-0130

SUBJECT: APPROVAL OF REVISION 11.0 OF THE PHYSICAL PROTECTION PLAN
(ENTERPRISE PROJECT IDENTIFIER: L-2018-SPR-0001)

BACKGROUND INFORMATION

By letter dated June 29, 2018, Framatome Inc. (Framatome) submitted Revision 11 of the Physical Protection Plan (PPP) for review and approval by the U.S. Nuclear Regulatory Commission (NRC). The changes to the PPP are listed on the Description of Changes page provided as Enclosure 1 of the June 29, 2018 letter. The changes were submitted pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 70.32(e) and Section 70.34. One change that relates to security personnel equipment requires NRC pre-approval. Other changes include name change from AREVA, Inc. to Framatome, Inc.; expiration dates printed on picture badges; adding additional procedure numbers for reporting receipt of special nuclear material (SNM), and updating the site map to include the new Scrap Uranium Recover facility. Revision 11 replaces Revision 10 of the PPP in its entirety.

DISCUSSION

The purpose of this review was to determine that the changes made to Revision 11 of the Framatome PPP, made under the provisions of both 10 CFR 70.32(e) AND 70.34, did not reduce the safeguards effectiveness of the facility's physical protection program. The staff did not review the transportation section of the PPP because the changes proposed in Revision 11 of the Framatome PPP did not affect transportation security.

1. The provisions of 10 CFR 73.67(a) require that the licensee shall: (1) establish and maintain a physical protection system that will achieve the following objectives: (i) minimize the possibilities for unauthorized removal of special nuclear material consistent with the potential consequences of such actions; and (ii) facilitate the location and recovery of missing special nuclear material. (2) To achieve these objectives, the physical protection system shall provide: (i) early detection and assessment of unauthorized access or activities by an external adversary within the controlled access area containing special nuclear material; (ii) early detection of removal of special nuclear material by an external adversary from a controlled access area; (iii) assure proper placement and transfer of custody of special nuclear material; and (iv) respond to indications of an unauthorized removal of special nuclear material and then notify the appropriate response forces of its removal in order to facilitate its recovery.

Section 1 of the PPP, "Site and Facility Description," describes the features and procedures of Framatome's physical protection program. Specifically, Section 1.5, "Early Detection of Theft by an External Adversary," describes detection strategies for theft scenarios. Section 4 describes actions to locate potentially missing SNM.

The NRC staff has reviewed the applicant's description of the physical protection of SNM in Sections 1 and 4 of the PPP and finds that it meets the requirements of 10 CFR 73.67(a) and 70.34.

2. The provisions of 10 CFR 73.67(c) require that the licensee shall: (1) Submit a security plan or an amended security plan describing how the licensee will comply with all the requirements of paragraphs (f), and (g) of this section, as appropriate, including schedules of implementation. The licensee shall retain a copy of the effective security plan as a record for 3 years after the close of period for which the licensee possesses the special nuclear material under each license for which the original plan was submitted. Copies of superseded material must be retained for 3 years after each change. (2) Within 30 days after the plan submitted pursuant to paragraph (c)(1) of this section is approved, or when specified by the NRC in writing, implement the approved security plan.

Section 9 of the PPP, "Recordkeeping Requirements," states that Framatome will retain a copy of the current PPP for 3 years. Superseded copies shall be retained for 3 years after each change.

The NRC staff has reviewed the applicant's description of the physical protection of SNM in Section 9 of the PPP and finds that it meets the requirements of 10 CFR 73.67(c).

3. The provisions of 10 CFR 73.67(f)(1) requires licensees to store or use the material only within a controlled access area.

Section 1 of the PPP, "Site and Facility Description," states that SNM is used and stored exclusively within the controlled access area.

The NRC staff has reviewed the applicant's description of the physical protection of SNM in Section 1 of the PPP and finds that it meets the requirements of 10 CFR 73.67(f)(1).

4. The provisions of 10 CFR 73.67(f)(2) requires licensees to monitor with an intrusion alarm or other device or procedures the controlled access areas to detect unauthorized penetrations or activities.

Section 1 of the PPP, "Site and Facility Description," describe how the licensee monitors the controlled access area to detect unauthorized penetrations or activities. Specifically, Section 1.1.2.1 describes physical barriers including fencing; Section 1.1.2.2 describes points of ingress and egress; and Section 1.1.2.3 describes illumination. Section 1.4 describes security practices that detail means to monitor the controlled access area.

The NRC staff has reviewed the applicant's description of the physical protection of SNM in Section 1 of the PPP and finds that it meets the requirements of 10 CFR 73.67(f)(2).

5. The provisions of 10 CFR 73.67(f)(3) requires licensees to assure that a watchman or offsite response force will respond to all unauthorized penetrations or activities.

Section 2 of the PPP, "Security Organization and Responsibilities," describe the roles, responsibilities, and duties of the security organization. Section 2.1.3 states that the

manager of security and emergency preparedness (or their designee) will notify local law enforcement.

The NRC staff has reviewed the applicant's description of the physical protection of SNM in Section 2 of the PPP and finds that it meets the requirements of 10 CFR 73.67(f)(3).

6. The provisions of 10 CFR 73.67(f)(4) requires licensees to establish and maintain response procedures for dealing with threats of thefts or thefts of this material. Licensees shall retain a copy of the current response procedures as a record for 3 years after the close of period for which the licensee possesses the SNM under each license for which the procedures were established. Copies of superseded material must be retained for 3 years after each change.

Section 4 of the PPP, "Site Response Measures," describes actions that Framatome will take in response to various postulated events. Specifically, Table 4-1 describes events that require a contingency response; and Table 4-2 describes response actions for each event described in Table 4-1. Section 9 of the PPP, "Recordkeeping Requirements," states that Framatome will retain a copy of the current response procedures for 3 years. Superseded copies shall be retained for 3 years after each change.

The NRC staff has reviewed the applicant's description of the physical protection of SNM in Sections 4 and 9 of the PPP and finds that it meets the requirements of 10 CFR 73.67(f)(4).

7. The provisions of the Interim Compensatory Measures Order, dated February 6, 2003, is marked as "Safeguards Information" and withheld pursuant to 10 CFR 73.21.

The NRC staff has reviewed the applicant's description of the physical protection of SNM in Sections 1, and 2 of the PPP and finds that it meets the requirements of the Interim Compensatory Measures Order, dated February 6, 2003.

ENVIRONMENTAL REVIEW

The changes requested by this amendment are related solely to safeguards matters. The provisions of 10 CFR 51.22(c)(12) state that such actions are excluded from the requirement to perform an environmental review. Therefore, as authorized by 10 CFR 51.22(c)(12), neither an environmental impact statement nor an environmental assessment has been prepared for this amendment.

CONCLUSION

The methods and procedures outlined in Framatome's PPP Revision 11, satisfy the performance objectives, systems capabilities, and reporting requirements specified in 10 CFR 73.67 and the applicable portions of Interim Compensatory Measures Orders. Therefore, the NRC staff finds the Framatome's PPP Revision 11, is acceptable and provides reasonable assurance that the requirements for the physical protection of Low Strategic Significance SNM will be met.

REFERENCES

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 73.67, "Physical Protection of Special Nuclear Material of Moderate and Low Strategic Significance".

Interim Compensatory Measure Order Number EA-03-Cat III, dated February 6, 2003 (SGI).

PRINCIPAL CONTRIBUTOR

Timothy E. Harris