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Submitter Information

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General Comment

I appreciate the hard work that NRC, DOE, and NMMSS staff have put into improving the nuclear material transaction reporting guidance.
My comments on NUREG/BR-0006 Revision 9 are in the attached document.

Attachments

Wilbricht Comments on BR-0006

I appreciate the hard work that NRC, DOE, and NMMSS staff have put into improving the nuclear material transaction reporting guidance.

- Page 8 instructions for block 19 Material Type states that only the domestic codes are to be used. This contradicts the instructions of Appendix F.
- Page 10 block 26 instructions are for shipper's data. The instructions on lines 24-28 apply to receiver's data.
- Page 12 block 26h Comp Code
 - The 2nd paragraph instructions about the "facility" seem to refer to the "reporting facility". This could be made more clear. Also, there are no explicit instructions for how a facility (IAEA selected or not) should select comp codes for a report made on behalf of a foreign shipper.
- Page 13 block 26k1 Measurement Basis.
 - The language for L and T about preceding ICR or physical inventory listing is inconsistent. L mentions 741 and 742C reports. T mentions ICRs and PILs.
 - L and M refer to the "present MBA". This term is confusing within the context of a shipment or receipt. I suggest you define what "present MBA" means.
 - Footnote 5 is misleading. The leading phrase "Use the M or N code to..." implies that M and N are only used for receipts. A domestic IAEA selected facility reporting a shipment commonly uses M or N.
 - Additionally, the Footnote 5 ending clause "within the MBA" applies only to the M code.
 - Footnote 6 is malformed (at least within my PDF viewer). Part of the sentence is cutoff.
 - The instructions for this block do not discuss the case where you are reporting for a foreign shipper. In this case, the measurement basis is not known and 26k1 is left blank.
- Appendix A, Page 1, line 17.
 - Report D-2 is mentioned. I believe this is report D-25 COEI/Composition Code Reference.
- Appendix B, RD, RN, SD, SN
 - Per a NMMSS analyst: RD and SD are to be used only for receipts from, and shipments to, the IAEA selected facilities. Use RN and SN for receipts from, and shipments to, any other domestic facilities. Similarly, when the other selected facilities ship to, or receive from a selected facility they would use RD or SD because other party is a selected facility.
 - RN correctly uses the phrase "not subject"
 - SN is missing the "not"
 - I suggest the code descriptions be worded as:
 - RD receipt from activity subject to Part 75
 - RN receipt from activity not subject to Part 75
 - SD shipment from facility subject to Part 75
 - SN shipment from facility not subject to Part 75
 - Including the Part 75 constraint in RD and SD makes the choice between xD or xN mutually exclusive and less confusing.
 - Also, RN now has an expanded version of "10 CFR Part 75" but SN does not.

- Appendix F, Page 1, line 26/27 and the bullets that follow describe constraints on “the exchange of obligations”. I think this is accurate only if when considered as “the exchange of obligations between facilities”. Otherwise the routine internal transactions described on page 3 could be considered an exchange and would require advance written US Govt approval before downblending or upblending across D,N,E boundaries. I suggest the term exchange be defined as it is very important in understanding the requirements.
- Appendix F, Page 4 Block 19 instructions ends with “obligated.” This appears to be a one word sentence that should not be present.

Thank you for your consideration of these comments.

Mike Wilbricht
September 6, 2019