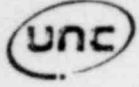


UNC RECOVERY SYSTEMS

~~70-820~~ 70-820



Division of United Nuclear Corporation
A **UNC RESOURCES** Company
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MQA: 80-30



March 7, 1980

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U.S. Nuclear Regulatory Commission
James G. Partlow, Chief
Material Control and Accountability
Licensing Branch
Division of Safeguards
Washington, D.C. 20555

Reference: Letter, James G. Partlow to C. E. Bowers,
dated January 3, 1980

Gentlemen:

The referenced letter requested that UNC modify our Fundamental Nuclear Material Control Plan to clarify that "book record" includes both the total plant and subsidiary material control area records. Accordingly, we have modified section 5.12 of the FNMC, and are submitting it with this letter. Also attached are minor administrative changes to section 6.1 of the FNMC. As none of the submitted changes decrease the effectiveness of the material control and accounting program, no license fee is being submitted, consistent with your letter of March 20, 1979.

Very truly yours,

R. J. Gregg
Manager, Quality Assurance

RJG:ddm

Enclosure

cc: C. E. Bowers
J. H. L'Heureux

FEE EXEMPT

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5.10 Materials on Inventory

Batchwise-operated equipment will be inventoried as empty and clean. Material in the extraction system will be recycled to a constant level. Extraction feed and product tanks and the evaporator product tank will be recirculated to provide homogeneity prior to sampling and measurement. These tanks will vary in contents depending on prior production. Their maximum capacity is given below:

1-D-41	Extraction Feed Tank	1690 gal.
1-D-9's	Extraction Feed Tank	270 gal.
1-D-10's	Evaporator Feed Tanks	180 gal.
1-D-16	Evaporator Product Tank	45 gal.
1-D-24B	Filtrate Tank	520 gal.

Tanks used for volume measurement, containing Borosilicate Raschig Rings, will be calibrated at least once per year. All tanks inventoried as other than empty will have undergone calibration within the previous twelve months. For inventory purposes in-process material will be reduced to a minimum. Chemical assays will be run on all in-process material where possible. Material in storage, which is satisfactorily sealed, will be inventoried at its measured value.

5.11 Inventory Verification

The identity and location of all items is verified independently by at least two members of the inventory team. The Inventory Control Roster is also checked against the ICA and MBA records for an additional verification of the identity and location of all items.

5.12 Inventory Reconciliation

Resolution of discrepancies between primary and secondary accounts and the physical inventory are the responsibility of the Manager, Nuclear Material Control. Discrepancies will be verified before reconciling primary records to the physical inventory. All inventories will be reconciled and the results reported to the USNRC within 30 days from the start of the inventory. Both primary (total plant) and secondary (MBA) records will be adjusted to the results of the physical inventory at the time of reconciliation.

6.1.1.1 Accounting Forms (continued)

4. SNM Lease Ledger - a listing of all transactions concerning lease material from the SNM Transaction Journal. Transactions are posted monthly to appropriate accounts and balanced on a monthly basis and every inventory period.
5. Thorium Journal - a permanent chronological listing of all plant transactions which would affect the total status of thorium. Daily entries are made to reflect all receipts, shipments, transfers, losses, or gains of thorium for that day.
6. Contract Ledger - a categorization of GFU material to contract from SNM GFU Ledger. Posting and balancing is done on a monthly basis and summarized every six months for activity in that period.
7. ICA #1 Ledger - a listing of all SNM transactions for ICA #1. Entries are posted to reflect daily transactions and balanced on a monthly basis and every inventory period.
8. MBA #2 or ICA #3 Ledger - a listing of all SNM transactions for MBA #2 and ICA #3. Entries are posted to reflect daily transactions and balanced on a monthly basis and every inventory period.
9. MBA General Ledger - a combined listing of all SNM transactions for ICA #1, MBA #2 and ICA #3. Entries are posted to reflect daily transactions and balanced on a monthly basis and every inventory period.
10. ICA #1 Storage Log - a sequential listing of all containers or inventory in ICA #1 by MBA number and location.
11. MBA #2 Plant Storage Log - a chronological listing of containers stored in fixed locations in MBA #2 and ICA #3.
12. MBA #2 Process Material Notice Log - a listing of all in-process containers not otherwise covered by the PS Log.

6.1.1.2 Flow Chart

A flow chart of the records and documents used for Special Nuclear Material accounting is shown in Figure 6.1.

6.1.2 Accounting Procedures

An Accounting Procedure Manual shall be prepared and periodically updated by the Manager, QA.

6.1.3 Source Data

Source data used as the basis for original entry to the accounting records are NRC/DOE 741 transfer documents for the accounting system and Material Balance Area (MBA) Transfer Sheets for the MBA and ICA systems.

6.1.4 Adjustments to Records

Adjustments to prior recorded values to the SNM accounting records are made by means of the NRC/DOE 741 Transfer Document supported by a memorandum with the approval of the Manager, Nuclear Material Control or the Manager, QA.

Adjustments to prior recorded values to the MBA records are made by means of the MBA Adjustment Sheet prepared under the direction of, and the approval of, the Manager, QA or Manager, Nuclear Material Control.

6.1.5 Bias Adjustments

Bias Adjustments for measurements are incorporated into the accounting system in the same manner as described in section 6.1.6 except the supporting memorandum must be approved by the Plant Chemist or the QA Engineer as well as the Manager, QA.

6.1.6 Inventory Reconciliation

The sum of the physical inventory values for ICA #1, MBA #2, and ICA #3 represent the physical inventory for the entire plant. ICA #1, MBA #2, and ICA #3 accounts are adjusted to reflect the actual physical inventory for the respective area.

The Transfer Journal and associated Ledgers are also adjusted to the total plant physical inventory by booking the difference between the book balance and the physical inventory as MUF. The inventory difference is booked by means of an NRC/DOE 741 transfer document. The ID booked is approved by the Manager, NMC.

A flow chart of the adjustment proceedings is shown in Figure 6.2.