



April 2, 2020
TJT:20:009

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

Gentlemen:

Subject: Resubmittal of Request to extend the due date for submitting DOE/NRC Forms 742, 742C, and NRC Form 327 following inventory at Framatome Inc.'s Richland, Washington Site; License No. SNM-1227, Docket No. 70-1257

As you are aware, 10CFR74.13 Material status reports requires §74.31 licensees to submit Material Balance Reports (DOE/NRC form 742) and Physical Inventory Listing Reports (DOE/NRC form 742C) within 60-days of the beginning of inventory. As an IAEA selected facility, 10CFR75.35 requires the Richland site to submit these reports within 30 days of the beginning of inventory. 10CFR74.13 also states, "The Commission may permit a licensee to submit the reports at other times for good cause." Additionally, §74.17 requires §74.31 licensees to submit completed Special Nuclear Material Physical Inventory Summary Reports on NRC form 327 within 60 days.

The purpose of this correspondence is to request a 30-day extension for submitting these Material Balance Reports, Physical Inventory Listing Reports, and Special Nuclear Material Physical Inventory Summary Reports. If this request is granted, DOE/NRC form 742 and 742C reports would be submitted within 60 days of the start of inventory and NRC form 327 reports would be submitted within 90 days of the start of inventory.

The reason for requesting this exemption is because a key person who completes the majority of the work required to submit these forms has been unavailable to work on them. The reason for his unavailability is a combination of Framatome's protocols associated with COVID-19, and a respiratory illness that has impacted this key employee.

As required by § 74.31(c)(5), Framatome has completed the physical inventory item reconciliation that was initiated on March 16, 2020. There is no indication of anomalies associated with inventory, or any identified reason that completing the required reports will be more difficult than any recent inventory.

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Framatome will work as aggressively as possible to complete these forms as soon as possible, but may not be able to meet the prescribed dates given current circumstances.

We appreciate the NRC's consideration of this request. If you have questions, please feel free to contact me on 509-375-8550.

Very truly yours,

A handwritten signature in black ink that reads "T. J. Tate". The signature is written in a cursive style with a large initial "T" and a long horizontal stroke.

T. J. Tate, Manager
Environmental, Health, Safety & Licensing

cc: Osiris Siurano-Perez;
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c: CD Manning