



June 3, 2020  
MJW:20:016

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

**Subject: NRC Form 327 for Framatome Inc. (Lic. No. SNM-1227; Docket No. 70-1257)**

Enclosed are completed NRC Form 327s which report the results of our material balance accounting and SEID calculations for the period March 19, 2019 to March 16, 2020.

The information in the enclosure is proprietary in accordance with 10 CFR 2.390(d). An affidavit supporting the proprietary nature of this information is attached.

Best regards,

A handwritten signature in cursive script that reads "mi wilbricht".

Michael Wilbricht  
Sr. Safeguards Specialist

## Explanatory Notes

### LEU

1. It is assumed that the non-measurement contribution to SEID is equal to the measurement contribution.
2. The SEID limit is computed as 0.177 percent of line 11a.
3. The LEID limit is computed as 0.250 percent of line 11a.

### HEU

1. The LEID and SEID are estimated to be 1 gram U and 1 gram U235 based on qualitative review of errors in liquid concentrations, volume and mass measurements, analytical %U and %U235 measurements, and comparisons to standard certificates.
2. The SEID limits are set to their alternate limits of 6,400 grams U235 and 200,000 grams U per NUREG/BR-0096.
3. The LEID limits are similarly set to 9,000 grams U235 and 300,000 grams U.
4. The ID limit is set to the 10-CFR-74.51 license minimum ID limit of 300 grams U235.

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