

From: [Helvenston, Edward](#)
To: ["Drew Peebles"](#)
Cc: ["Darrell Gardner"](#); [Martin Bryan](#); [Ani, Suzanne](#); [Beasley, Benjamin](#); [Cuadrado de Jesus, Samuel](#)
Subject: Question on Material Control and Accounting for the Hermes General Audit
Date: Monday, May 2, 2022 7:53:00 AM

Drew,

Below is one question on Material Control and Accounting (MC&A; it does not correspond to a specific PSAR section but we've binned as Chapter 12). We would like to include this in the scope of the General Audit (see audit plan dated 2/10/2022, ADAMS Accession No. ML22039A336), and I am providing this in advance to facilitate discussion during an audit meeting. Once Kairos is ready to discuss, please let us know and we can set up a meeting. We will add this e-mail with questions to public ADAMS. If any questions, please let Ben, Sam, or I know.

Thanks,
Ed

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| 12.13-1 | While there is no mention of material control and accounting in the PSAR, the PSAR states that Kairos plans to request authorization to possess special nuclear material (SNM) pursuant to 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material". In accordance with 10 CFR 70.22(b), applicants requesting a license to possess SNM must submit a full description of their program for the control and accounting of SNM and show compliance with the applicable requirements in 10 CFR Part 74, "Material Control and Accounting of Special Nuclear Material." Please confirm if Kairos is deferring the description of its MC&A program until an application for a license requesting authorization to possess SNM (e.g., a Hermes operating license application). |
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Ed Helvenston, U.S. NRC

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