



**UNITED STATES
NUCLEAR REGULATORY
COMMISSION
WASHINGTON, D.C. 20555-0001**

September 28, 2022

Scott P. Murray
Manager, Facility Licensing
Global Nuclear Fuel - Americas
3901 Castle Hayne Road
P.O. Box 780
Wilmington, NC 28402

SUBJECT: REVIEW OF GLOBAL NUCLEAR FUEL-AMERICAS (GNF-A) REQUEST FOR APPROVAL TO REASSIGN FOREIGN OBLIGATIONS FOR LOW ENRICHED URANIUM (LEU) INVENTORY

Dear Scott Murray:

With this letter the U.S. Nuclear Regulatory Commission (NRC) is responding to the letter from Global Nuclear Fuel - Americas (GNF-A) dated June 30, 2022, that requested U.S. Government prior approval to assign foreign obligations on similar and fungible uranium inventory specific in the current GNF-A special nuclear material (SNM) license SNM-1097 included as Reference 1 in the letter. The incoming letter from GNF-A is available in the NRC Agencywide Document Access and Management System (ADAMS) at accession number ML22259A198 (Enclosure 1).

The NRC reviewed GNF-A's request in consultation with its U.S Government interagency partners, the Department of State and Department of Energy/National Nuclear Security Administration. The interagency confirms that GNF-A's proposed practice for assigning foreign obligations on LEU, as described in their June 30 request and further discussed in their current license amendment application (Enclosure 2), meets the core principles for tracking foreign obligations on LEU. Specifically:

- Quantities of material to be exchanged shall agree with quantities and enrichment level of material that will be authorized under the amended license, if granted, and to the terms given in the GNF-A request dated June 30, 2022.
- The assignment of foreign obligations from E1 to E2 material shall follow the uranium-235 to preserve obligations across isotopic enrichment and follow all other like-for-like constraints expressed in NUREG/BR-0006, Appendix F.
- Foreign obligation accounting shall not be conducted for the purposes of removing foreign obligations from natural progression in the fuel cycle (e.g., swapping obligations to waste to create unobligated non-waste material). Foreign obligations assigned to process-generated waste shall follow the proportionality principle.

By this letter and upon issuance of License Amendment 18 for SNM-1097, GNF-A will have U.S. Government prior approval to continue assigning and tracking foreign obligations on LEU in inventory that crosses the E1 and E2 reporting boundary.

Should you have any questions on assigning and tracking foreign obligations, please contact Mirabelle Shoemaker by email (Mirabelle.Shoemaker@nrc.gov) or phone (301-415-7363).

Sincerely,

James L.

Rubenstein

James L. Rubenstein, Chief
Material Control and Accounting Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Digitally signed by
James L. Rubenstein
Date: 2022.09.28
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Enclosures:

1. Global Nuclear Fuel - Americas (GNF-A),
Request for Approval to Reassign Foreign
Obligations for Low Enriched Uranium (LEU)
Inventory
ADAMS Accession No. ML22259A198
2. GNF-A License Amendment Request for 8 wt. %
U 235 (LEU+) ADAMS Accession No. ML22175A070

SUBJECT: REVIEW OF GLOBAL NUCLEAR FUEL-AMERICAS (GNF-A) REQUEST FOR APPROVAL TO REASSIGN FOREIGN OBLIGATIONS FOR LOW ENRICHED URANIUM (LEU) INVENTORY DATE September 28, 2022

ADAMS Accession No.: Ltr ML22259A200

OFFICE	NMSS/DFM/MCAB	NMSS/DFM/MCAB	NMSS/DFM	
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DATE	Sep 20, 2022	Sep 28, 2022	Sep 21, 2022	

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