

**From:** [Matt Bartlett](#)  
**To:** [Love, Barry](#)  
**Subject:** 10-12-22 Summary of Call with UUSA Regarding SPPP Updates for Centrifuge Assembly Building and 32 CFR 117.  
**Date:** Tuesday, October 18, 2022 7:43:00 AM  
**Importance:** High

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Barry,

Below is a brief summary of the closed meeting held on October 12, 2022, between the Nuclear Regulatory Commission and URENCO, USA (UUSA) staff to discuss alignment on the draft responses to the 9 Requests for Additional Information (RAI) regarding the Compliance Plan for implementing Title 32 *Code of Federal Regulations* (CFR) Part 117. The NRC and UUSA staff agreed that items marked as Not Applicable would be revised to clarify that UUSA is in compliance in the applicable sections of the regulations. The NRC and UUSA staff discussed the RAI 5 to ensure alignment on the meaning of the words contractor (e.g., NRC licensee) and sub-contractor (e.g., UUSA contractor). The NRC staff encouraged UUSA to increase the justification for waivers to better explain why they are needed. The NRC staff asked UUSA to clarify the response to RAI 7 to better explain the use of “supplemental protection” areas. UUSA agreed to submit final RAI responses before the end of October and updates to the Compliance Plan shortly thereafter, via a separate submittal letter. This approach is acceptable to the NRC staff.

The UUSA staff described plans to submit a number of Standard Practice and Procedures Plan (SPPP) updates including: 1) updates to the LES SPPP and 2) compliance with 32 CFR 117. The UUSA staff indicated the updates for the Centrifuge Assembly Building (CAB) building are a restoration of the previously approved SPPP language used prior to termination of the CAB in 2018. The NRC staff indicated the new CAB SPPP would be reviewed as a new submittal but with awareness of the previous approval. The UUSA staff also asked if the NRC staff anticipate any administrative efficiencies to submitting these two SPPP updates as a single submittal or separately. The NRC staff can process the submittals either way and anticipates only minor (e.g., ~5 hours) administrative savings for processing a combined submittal versus two separate submittals.

The parties also discussed the fact that the NRC’s enforcement discretion for compliance with 32 CFR 117 ends November 22, 2022. The 32 CFR 117 waivers will be issued with the compliance plan determination letter. When the NRC’s enforcement discretion ends on November 22, 2022, UUSA should continue to implement the existing approved SPPP, the requirements in 32 CFR 117, and the waivers approved as part of the compliance plan determination. Any substantive changes to the SPPP to bring it into alignment with 32 CFR 117 should be implemented as soon as practical, but the NRC staff recognize these updates may not be in place by the time the enforcement discretion expires. Compliance with the existing SPPP, regulations, and approved waivers are sufficient during development of the SPPP updates.

Let me know if you have any comments by COB today. This summary will be docketed in public ADAMS.

Sincerely,

Matt Bartlett  
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