



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

December 7, 2022

MEMORANDUM TO: Carrie Safford, Deputy Director
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: Bernard White, Senior Project Manager
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

A handwritten signature in blue ink that reads "Bernard White".

Signed by White, Bernard
on 12/07/22

SUBJECT: SUMMARY OF OCTOBER 4, 2022, MEETING WITH URENCO USA
TO DISCUSS THE SCOPE OF ITS QUALITY ASSURANCE PLAN

Background

On October 4, 2022, a virtual meeting was held, at the request of the Louisiana Energy Services doing business as Urenco USA (UUSA) with the U.S. Nuclear Regulatory Commission (NRC) staff to discuss the UUSA quality assurance (QA) plan as it relates to a proposed exemption for approval to ship uranium hexafluoride that is enriched to 10 weight percent uranium-235 (²³⁵U) in the Model No. DN30 package. The list of meeting attendees is provided as Enclosure 1. The presentation used in the meeting is provided as Enclosure 2. The NRC previously met with UUSA on the exemption on December 13, 2021 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML22004A169).

UUSA requested the meeting to discuss the scope of its Part 71 QA plan. The existing UUSA QA plan (ML15247A244) is considered a user-only plan, which only authorizes those activities related to licensee use of a package and does not extend to package design and fabrication. The discussion at the meeting centered on whether the exemption request is considered a design change or confirmatory calculations.

Discussion

At the meeting, UUSA provided a brief overview of its proposed exemption and its QA Plan for shipments it makes pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 71, "Packaging and Transportation of Radioactive Material." UUSA stated that, for shipments of enriched uranium hexafluoride it makes to fuel fabricators, the NRC approval of its QA Plan is for a user-only of these packages, as UUSA does not design or fabricate packages.

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UUSA stated that it would perform all the calculations for the exemption under its procedures for its QA Plan that NRC approved for UUSA's enrichment activities under 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material." Specifically, UUSA briefly discussed procedures that it uses when performing engineering calculations to support the plant design changes, other activities for onsite uranium, and calculations that are not considered design calculations.

Since UUSA is not proposing to make changes to the packaging design, only changes to the maximum authorized enrichment, UUSA stated that it considers calculations to increase the enrichment of the uranium hexafluoride transported in the DN30 package to be confirmatory calculations to ensure the existing design maintains criticality safety and dose rate margins. UUSA does not consider these calculations to be design calculations. UUSA stated that based on this, it will revise its Part 71 QA plan description and QA manual to provide authority to perform and use confirmatory, non-design calculations for the revision to the DN30 contents, establish a bridge between the two QA related documents and, as necessary, make other conforming changes. UUSA also stated that these changes have been screened and evaluated in accordance with 10 CFR 71.106, "Changes to Quality Assurance Program," and based on UUSA's evaluation, do not require prior approval by the NRC.

The NRC stated that it had not thought about considering these types of calculations to be confirmatory calculations but had always considered them to be design calculations. The NRC also stated that it could not make that determination at this meeting, since it would need legal review to make this interpretation. NRC stated that it understands that UUSA would like to submit the exemption request to the NRC by the end of 2022 and therefore, would expeditiously write up its understanding of the issue and concerns and send them to the NRC's Office of the General Counsel for review.

There was also discussion about UUSA submitting an exemption to 10 CFR 71.101(f) to be able to consider its QA plan approved for its activities under 10 CFR Part 70 as a previously approved QA plan, as if it were a "A Commission-approved quality assurance program that satisfies the applicable criteria of subpart H of this part, Appendix B of part 50 of this chapter, or subpart G of part 72 of this chapter." The NRC stated, if needed, it would consider this exemption request.

Docket Nos. 70-3103 and 71-9362
EPID No. L-2021-LRM-0119

Enclosures:

1. Meeting Attendees
2. Meeting Presentation

SUBJECT: SUMMARY OF OCTOBER 4, 2022, MEETING WITH URENCO USA TO DISCUSS THE SCOPE OF ITS QUALITY ASSURANCE PLAN

DOCUMENT DATE: December 7, 2022

DISTRIBUTION:

NRC Meeting Attendees

K. Jamerson, NMSS

H. Lindsay, NMSS

ADAMS Accession Nos.: ML22336A219 (pkg), ML22336A220 (slides), ML22336A221 (memo)

OFFICE	NMSS/DFM	NMSS/DFM	NMSS/DFM
NAME	BWhite	SFigueroa	YDiaz-Sanabria
DATE	12/05/2022	12/05/2022	12/06/2022

MEETING ATTENDEES

Meeting Title: Summary of October 4, 2022, Meeting with Urenco USA to Discuss the Scope of its Quality Assurance Plan

Participants: Urenco USA and the NRC

Date: October 4, 2022

Location: Teleconference

NAME	AFFILIATION
Bernie White	NRC
Jon Woodfield	NRC
Aaron Thomlinson	NRC
Matt Bartlett	NRC
Aida Rivera-Varona	NRC
Wyatt Padgett	UUSA
Kevin Slavings	UUSA
Olimpio Torres	UUSA
Chris Schwarz	UUSA
Jim Freels	UUSA
Members of the Public	
Jay Thomas	TN Americas LLC
Peter Vescovi	TN Americas LLC