



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

June 24, 2025

Timothy J. Tate, Manager
Environmental, Health, Safety and Licensing
Framatome, Inc.
2101 Horn Rapids Road
Richland, WA 99354

SUBJECT: REVIEW OF FRAMATOME, INC. REQUEST FOR APPROVAL TO RE-ASSIGN
FOREIGN OBLIGATIONS FOR LOW-ENRICHED URANIUM INVENTORY

Dear Timothy Tate:

With this letter the U.S. Nuclear Regulatory Commission (NRC) is responding to the letter from Framatome, Inc. (Framatome) dated January 20, 2025, that requested U.S. Government prior approval to assign foreign obligations on similar and fungible uranium inventory specific in the license amendment application for SNM-1227. The incoming letter from Framatome is available in the NRC Agencywide Documents Access and Management System (ADAMS) at Accession No. ML25020A007.

The NRC reviewed Framatome, Inc.'s request in consultation with the U.S. Government interagency partners: the U.S. Department of State and U.S. Department of Energy/National Nuclear Security Administration. The interagency confirms that Framatome proposed practice to re-assign foreign obligations on material transactions and on material in inventory that results from blending operations during the fabrication process meets the core principles for tracking foreign obligations on low-enriched uranium (LEU). Specifically:

1. 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 Framatome's request dated January 20, 2025.
2. The assignment of foreign obligations from E1 to E2 material shall follow the U-235 to preserve obligations across isotopic enrichment and follow all other like-for-like constraints expressed in NUREG/BR-0006, appendix F.
3. 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.

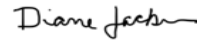
By this memo and upon issuance of License Amendment 21 for SNM-1227, Framatome will have U.S. Government prior approval to continue tracking foreign obligations on LEU in inventory that crosses the E1 and E2 reporting boundary.

In accordance with Title 10 of the *Code of Federal Regulations* Part 2, "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room (PDR) or from the Publicly Available Records component of

the NRC's ADAMS. ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. The PDR is open by appointment. To make an appointment to visit the PDR, please send an email to PDR.Resource@nrc.gov or call 1-800-397-4209 or 301-415-4737, between 8 a.m. and 4 p.m. eastern time (ET), Monday through Friday, except Federal holidays.

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,



Signed by Jackson, Diane
on 06/24/25

Diane Jackson, Chief
Material Control and Accounting Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

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DATED: June 24, 2025

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