



Amendments to Material Control and Accounting Regulations

TRTR Annual Meeting
August 6, 2014

Mike Morlang
TRTR Oversight Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Overview

- Background and Objectives
- Proposed Changes
- Current Status
- Next Steps

Background and Objectives

- The NRC's desire for rulemaking was decided by the Commission in 2005 after a comprehensive review of the NRC's MC&A and physical protection program following the 9/11 event
- The goal of this rulemaking is to revise and consolidate the MC&A requirements in order to update, clarify, and strengthen them

Background and Objectives

- Recommendations resulting from internal audit and independent and objective examination of NRC MC&A regulations and practices
- Potential deficiencies in licensees and NRC programs (e.g., apparent loss or misplacement of SNM or unintended shipping of SNM)
- Results of MC&A inspections that indicated a need to better clarify regulations and policies
- Recognized systematic inefficiency issues with current regulations (e.g., reliance on exemptions)

Proposed Changes

- Part 74 will be revised to be applicable for current and future facilities
- Most MC&A regulations in other chapters will be consolidated in Part 74
- MC&A regulatory guides and NUREG publications will be updated in conjunction with the Part 74 rule

Proposed Changes

- Revise Subpart B – General Reporting and Recordkeeping Requirements - to include general performance objectives and basic system capabilities for all licensed facilities
- Revise and add definitions (e.g., MC&A, item, MBA, physical inventory, waste)
- Require an item control system for reactor licensees and independent spent fuel storage installation licensees

Proposed Changes

- Enhance tamper-indicating device (TID) and material balance area (MBA) programs
- Revise and eliminate exemptions (e.g., 500-gram item control for Category III facilities)
- Relocate Part 72 MC&A requirements
- Other miscellaneous changes

Cumulative Effects of Regulation

- Stakeholder input is solicited on specific aspects of the proposed rule:
 - Appropriate threshold of SNM on which item control requirements should be imposed
 - Need for the requirements in relation to the proportionate levels of risk represented by the processes and material quantities and forms
 - Less burdensome alternatives to the proposed requirements while maintaining adequate MC&A program

Current Status

- Proposed rule and guidance documents published (78 FR 67224 and 67225 , November 8, 2013)
- Two public meetings and webinar format conducted on January 9 and February 5, 2014
- 122-day public comment period ended on March 10, 2014
- 25 comment letters received and posted in www.regulations.gov with respect to the draft rule and guidance documents

Next Steps

- Resolve the public comments
- Develop the draft final rule, regulatory analysis, and revised NUREG guidance documents
- Hold a public meeting about implementing the final rule
- Submit the draft final rule package to the Commission and obtain approval to publish the final rule and revised NUREGs
- Expect the final rule to be published in late 2015

Questions & Answers