

[REDACTED]

DOCKET: 70-1257

LICENSEE: AREVA NP Inc.  
Richland, WA

SUBJECT: SAFEGUARDS EVALUATION REPORT: SUBMITTAL DATED JUNE 27, 2006,  
REVISION TO THE FUNDAMENTAL NUCLEAR MATERIAL CONTROL PLAN

### BACKGROUND

By cover letter dated June 27, 2006, AREVA NP Inc. Richland submitted Version 2.0 of its Fundamental Nuclear Material Control (FNMC) Plan, now known as document E07-01-001. The FNMC Plan revision replaces the previous Revision 35, known as EMF-12(P), with all pages dated December 2003, which automatically became Version 1.0 when the site adopted the new *Documentum* document control application software system (per telecon discussion with Material Control and Accounting (MC&A) Supervisor D. L. Noss on September 20, 2006). This FNMC Plan revision was submitted under the provisions of 10 CFR 70.32(c)(1)(iii), which does not require U. S. Nuclear Regulatory Commission (NRC) approval prior to implementation since the changes would decrease the effectiveness of the licensee's MC&A program.

### DISCUSSION

The June 2006 submittal provided a page (Page i) that described the nature of the FNMC Plan revision. Every page of the previous revision was changed to reflect the new document name (E07-01-001), the new version (Version 2.0), and the new name of the facility's parent company (AREVA NP Inc.). There were no dates on the FNMC Plan pages corresponding to Version 2.0. In addition, numerous pages had changes reflecting new procedure numbers that resulted from the migration to the *Documentum* system. Also, certain changes were made to Chapter 1.0, Organization, that clarified the organizational structure, position descriptions, and staff responsibilities due to organizational and position changes that have taken place under the new parent company, and are further discussed below.

The key additional Chapter 1.0 FNMC Plan revisions are as follows:

#### Chapter 1.0 Organization

##### 1.1.1 Functional Descriptions

This section now indicates that the Vice President of Manufacturing has the ultimate responsibility for safeguarding Special Nuclear Material at the Richland site.

[REDACTED]

[REDACTED]

### 1.1.2 Staffing

The Manager of Environmental, Health, Safety, and Licensing (EHS&L) reports to the Richland Site Manager independently of the operations organization, which assures independence of action and objectivity of decisions.

### 1.1.4 Position Descriptions

Changes to this section clarified the responsibilities and minimum qualifications for the Manager of EHS&L (which includes developing and monitoring the Richland site safeguards program), the Manager of Licensing and Compliance, the staff Specialist - Safeguards, the Manager of Analytical Services, and the Statistics/Safeguards Consultant.

#### 1.2.1.1 Special Nuclear Material Custodians

[REDACTED]

### 1.3 Training Program

This section now states that training for custodians is largely accomplished [REDACTED]

[REDACTED]

#### Table 1-1 Listing of Critical Procedures

This table now includes the *Documentum* identification number for each procedure and the associated responsible organization.

### ENVIRONMENTAL REVIEW:

This section states that the changes are considered administrative in nature. The staff has determined that the change is categorically excluded from the requirement to prepare a site-specific Environmental Assessment (EA). Therefore, in accordance with 10 CFR 51.22(c)(11), neither an EA, nor an Environmental Impact Statement is warranted for this action.

### CONCLUSION

Upon review of the revisions, the staff found that the changes are consistent with the regulatory requirements in Subpart C of 10 CFR Part 74. The staff has determined that the changes to the facility's FNMC Plan meet the requirements of 10 CFR 70.32(c)(1)(iii) in that there is no decrease in the effectiveness of the MC&A program, or the measurement control program implemented pursuant to 10 CFR 74.31(b), and it continues to provide an effective MC&A program at AREVA NP Inc. Richland. Accordingly, approval of the FNMC Plan changes are recommended.

[REDACTED]

[REDACTED]

In addition, Safeguards License Condition SG-1.1 of Materials License SNM-1227 should be amended to incorporate the revised FNMC Plan, to read as follows:

SG-1.1        The licensee shall follow Sections 0.0 through 8.0 (with all pages designated as Version 2.0 of E07-01-001) of the Fundamental Nuclear Materials Control Plan. This Plan may be further revised in accordance with, and pursuant to, the provisions of 10 CFR 70.32(c) or 70.34.

PRINCIPAL CONTRIBUTORS

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