



URENCO USA Comments for a Smarter Fuel Cycle Inspection Program

September 12, 2019

UUSA Corrective Action Program (CAP) Background

- **2013- UUSA sought NRC-Accredited CAP review and approval.**
- **UUSA voluntarily committed to revising our Quality Assurance Program Description by adding commitments as described in NUREG-2154 “Acceptability of CAPs at Fuel Cycle Facilities”.**
- **NRC approved UUSA’s CAP in early 2014.**

UUSA's Performance Assessment Program

- **The CAP is one of the management systems that supports a healthy nuclear safety culture.**
- **Our facility evaluates problems to ensure that corrective actions address causes and extent of conditions commensurate with their safety significance.**
- **Subsequently, UUSA receives an additional biennial NRC inspection for our Corrective Action Program.**

NRC's Proposals for IMC 2600 App B

- **Proposals A and C are intended for facilities with an NRC-accredited CAP.**
- **The revised inspection frequency under Proposals A and C is more focused and efficient for both the NRC and Licensee.**
- **UUSA urges the NRC to issue the revised version of IMC 2600 Appendix B to incorporate Proposals A through D early enough to begin the new inspection schedule in 2020.**