

Meeting with the Nuclear Energy Institute, the Nuclear Fuel Industry, and Stakeholders to Discuss Foreign Obligation Reporting Requirements for Low Enriched Uranium

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Instructions for Reporting Foreign Obligations

- **NUREG/BR-0006 and -0007 provide instructions for reporting foreign obligations on special nuclear material**
 - Foreign obligations for enriched uranium are assigned to the U-235 isotope weight.
 - The NUREGs instruct licensees to report their annual inventory holdings of enriched uranium as belonging to one of four material types:
 - E1, for uranium enriched greater than normal but less than 5 percent
 - E2, for uranium in enrichment of 5 percent or more but less than 20 percent
 - E3, for uranium in enrichment of 20 percent or more but less than 80 percent
 - E4, for uranium in enrichment of 80 percent or more
 - Reporting by these material types is only necessary for Material Balance Reports (NRC/DOE Form 742)

Reporting foreign obligations on LEU enriched between 5% and 10%

- **Licensees seeking to process E1 and E2 categories of LEU have requested clarification regarding foreign obligation reporting on products that require blending of E1 and E2 material.**
 - Appendix F of NUREG/BR-0006 identifies the like-for-like principles for tracking and exchanging foreign obligations.
 - Under current reporting instructions (Page F-1 of NUREG/BR-0006), licensees authorized to possess up to 10% enriched LEU would need to receive approval from the government for each reassignment of obligations from E1 to E2 material.
 - To reduce the burden of repeatedly requesting such approvals, industry has suggested that NRC adjust the E2 definition to uranium enriched to 10% or more, but less than 20%.

Recommendation from Interagency for Licensees seeking Prior Approval related to Foreign Obligations Tracking

- **The NRC and government interagency recommend not redefining the E1 and E2 material types, to avoid confusion with existing guidance.**
- **Alternatively, the interagency recommends the use of prior approval to licensees to assign foreign obligations to LEU in the E1 and E2 material types as necessary for blending.**
 - Licensees requesting a license amendment to possess LEU up to 10% enrichment may submit a written request for prior approval of obligation reassignment for their licensed blending operations.
 - NRC and the interagency will consider each request as received, and will have the ability to grant prior approval for obligation reassignments between E1 and E2 material.
 - Licensees can then ensure that appropriate obligations are assigned to blended products in the correct material type.

Requests for Prior Approval for Reporting Foreign Obligations on E1 and E2 material

- **NRC-licensed facilities may submit written request to the NRC with the following information:**
 - Proposed date to exchange obligations
 - Quantities of the materials to be exchanged (element weight; isotope weight, if applicable)
 - Material type and associated obligation(s) of the materials to be exchanged
 - Chemical and physical form of the materials to be exchanged
 - Purpose for conducting the exchange
 - RIS code(s) to be involved in the proposed change
- **Written requests can be copied to Foreign.Obligations@nrc.gov.**
- **Other special requests related to NMMSS reports of any nature can be submitted to NMMSS@nnsa.doe.gov or NMMSS.Resource@nrc.gov.**