RULEMAKING ISSUE
NOTATION VOTE

April 25, 2008 SECY-08-0059

FOR: The Commissioners

FROM: Luis A. Reyes
Executive Director for Operations

SUBJECT: RULEMAKING PLAN: PART 74 - MATERIAL CONTROL AND ACCOUNTING OF SPECIAL NUCLEAR MATERIAL

PURPOSE:

The purpose of this paper is to obtain Commission approval to proceed with a rulemaking to update and revise Title 10 of the *Code of Federal Regulations* (10 CFR), primarily 10 CFR Part 74. The rulemaking would provide a more risk-informed material control and accounting (MC&A) regulatory framework commensurate with the post-September 11, 2001 (9/11), threat environment.

SUMMARY:

Today's current threat environment differs from the pre-9/11 environment. In the new threat environment, safeguards programs should be designed to better ensure protection against the diversion or theft of material that could be used to fabricate an improvised nuclear device (IND). In order to better protect special nuclear material (SNM) from unauthorized diversion or theft, a re-assessment of the relationship between facility physical protection programs and MC&A programs is needed. MC&A requirements for SNM would continue to be based on material quantity and form, but would also take into consideration the relative attractiveness of the material for fabricating an IND.

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Accordingly, the staff recommends that Part 74 be amended to: (1) revise the SNM categorization values, and summarize this information in a new U. S. Nuclear Regulatory Commission (NRC) SNM categorization table that defines threshold quantities and material forms requiring varying levels of protection; (2) create a new diversion path analysis (DPA) requirement for fuel fabrication facilities possessing a Category I quantity of SNM and enrichment facilities as part of a detection and response program; and (3) revise and consolidate in Part 74 all SNM MC&A requirements.

BACKGROUND:

In 2003, the Office of the Inspector General (OIG) conducted an audit to determine whether the NRC adequately ensures that its licensees control and account for SNM. In its report (OIG-03-A-15), OIG recommended that the NRC document the basis used for risk informing NRC's oversight of MC&A activities.

In SECY-05-0143 (ML050870212) dated August 5, 2005, the staff proposed a number of changes to the MC&A program. These changes were based, in part, on: (1) the above referenced OIG recommendation; (2) an evaluation of NRC's MC&A regulatory program by Oak Ridge National Laboratory; and (3) staff considerations regarding the need to provide MC&A regulations for new types of licensees and facilities (e.g., a mixed oxide fuel fabrication facility). SECY-05-0143 also discussed the need to revise MC&A regulations related to the Nuclear Materials Management and Safeguards System (NMMSS), and to address MC&A requirements for a geological repository operations area. These rulemaking efforts are documented in SECY-07-0224 and SECY-07-0126, respectively.

In the November 18, 2005, Staff Requirements Memorandum (SRM) for SECY-05-0143 (ML053220618), the Commission directed staff to develop a rulemaking plan that addressed several issues. In this regard, the Commission directed the staff to: (1) include a discussion of the scope of the problem and potential solutions, including a broad overview of how MC&A is integrated with other regulatory activities; (2) clearly identify which activities require policy decisions by the Commission; (3) coordinate with all appropriate NRC offices; (4) clearly define the relationship between MC&A and physical security; (5) identify the level of effort and resources needed for developing the rulemaking and associated regulatory guidance, including a rough estimate of the impact on industry and the staff; (6) provide for timely development of regulatory guidance for any new regulatory requirements, including an overview of the methodology for implementing new requirements such as the DPA; (7) discuss development of risk-informed MC&A methods; (8) limit the rulemaking scope to SNM; and (9) provide for the maintenance and revision of existing regulatory guidance. These issues are addressed in the enclosed rulemaking plan.

In 2007 the U.S. Department of Energy (DOE) completed a detailed technical review of its SNM categorization table. The DOE review recommended revising the DOE table to provide appropriate protection for SNM based on material quantity, concentration, and form. The new categorization is based on the attractiveness of various SNM combinations to potential adversaries seeking to fabricate an IND. The new DOE table revises the SNM threshold values, based on an IND, and includes the non-SNM elements neptunium and americium. NRC's current MC&A regulations do not fully consider the material quantities and forms needed to fabricate INDs.

DISCUSSION:

As noted previously, DOE recently proposed revising its SNM categorization table to provide a risk-informed structure which provides increased protection for SNM. The proposed DOE categorization table uses attractiveness level as a factor to consider material types, concentrations, forms, and composition to more comprehensively reflect the relative ease/ difficulty and handling required to convert the various materials to a form more amenable to malicious use by an adversary.

The staff is recommending the addition of a similar SNM categorization table to Part 74. This would require: (1) modifying the SNM Category I – III threshold values; (2) adding subcategories for Categories I, II, and III to reflect attractiveness levels; and (3) grading of the requirements within each Category to reflect the attractiveness levels. Making these changes to Part 74 would permit the NRC to extend its grading of safeguards requirements for SNM to incorporate wider and greater consideration of chemical and physical forms, rather than just material quantity. Generic categorizations should reflect both the ease of detecting theft or diversion and the additional processing steps that would be necessary to convert the SNM into a form amenable for fabricating an IND. Revising the categorization threshold values provides more protection for materials which could be more readily used to fabricate INDs. Defining attractiveness levels in Part 74 would more clearly and completely assure that the stringency of the classes of requirements is commensurate with the theft/diversion attributes and the strategic worth of the full range of the types and quantities of SNM under NRC regulatory oversight. Similar to the proposed DOE table, the new NRC table would reflect a number of factors related to the attractiveness of the various forms of SNM to potential adversaries. Such factors include the material's physical form, the level of complexity of processing the material into other forms, and the concentration of SNM in the material. The Part 74 table would then result in the development of risk-informed requirements for the different categories of materials, based on their relative attractiveness to potential adversaries.

The proposed DOE categorization table contains two elements (americium and neptunium) that are neither considered nor treated as SNM by the NRC. While neither americium nor neptunium are considered to be SNM, both americium and neptunium are fissile elements. Although the November 18, 2005, SRM directed the staff to not expand the scope of the NRC's MC&A program beyond SNM, the staff is recommending inclusion of americium and neptunium in the SNM categorization table. The Commission was criticized by the U.S. Government Accountability Office in a classified audit in 2007 for differences in regulations governing the handling and accounting of the same type of nuclear materials and the inclusion of these two elements would address that issue in part. Americium and neptunium will also need to be addressed for the upcoming Global Nuclear Energy Partnership licensing activities (which would include spent fuel reprocessing). There are several issues associated with adding americium and neptunium to the NRC MC&A program that will need to be addressed during any rulemaking. Executive Branch agencies have expressed concern over treating these elements as SNM because of possible impacts on international treaties and questions of whether the NRC would push for the same changes internationally. Additional discussion with Executive Branch agencies would be necessary to further explore these issues. Both of these elements are currently licensed by Agreement States and the addition of these elements would impose NRC requirements on Agreement State licensees. NRC would need to inform the Agreement States and discuss the issue with them. The area of MC&A for SNM has historically been reserved to the NRC, Agreement States do not regulate this area, and the current thinking is to reserve any

MC&A requirements on these elements to the NRC. Therefore, the NRC would be responsible for reviewing and inspecting the new MC&A programs at the Agreement State licensees. Adding these elements would also require changes to the scope of the NMMSS contract with a resultant increase in cost. DOE currently reports americium and neptunium information to NMMSS. This rulemaking would not address changes to the physical protection or safety aspects of licensing americium and neptunium. A separate rulemaking would be conducted to address these aspects after development of a technical basis.

The staff also proposes to require enrichment facilities and Category I fuel fabrication facilities to conduct a DPA. A DPA is a systematic process for generating, documenting, and analyzing diversion paths throughout a facility as a measure of the overall effectiveness of the safeguards system. The DPA reflects the synergism between a physical protection program and an MC&A program in that vulnerability assessments are used by physical protection programs to mitigate potential external threats and attacks, while the DPA is used to mitigate potential internal threats and attacks. The DPA would focus on the internal threat aspects of protecting SNM and would identify conceivable and credible paths for the clandestine theft, diversion, or other misuses of SNM, as well as methods to thwart the use of such paths.

The staff further proposes to revise and consolidate in Part 74 NRC's MC&A regulations. Many of the current MC&A requirements were developed over 20 years ago and warrant a fresh look. The requirements for licensees that do not fall under Category I, II, or III need to be revised to add general performance objectives. Some of the existing requirements need to be clarified. The staff believes that all MC&A regulations pertaining to SNM for NRC licensees should be in Part 74. This would provide a focal point and complete framework/umbrella for controlling and accounting for all SNM under NRC oversight. Part 74 was created for SNM MC&A requirements in 1985 to separate them from the other safety requirements and to present the requirements in an orderly format. Since that time, most of the MC&A requirements have been moved to Part 74. All that remains to be moved are the requirements in Part 72 that apply to Independent Spent Fuel Storage Facilities (ISFSIs).

Regulatory Options:

Six options have been developed for Commission consideration. A more detailed discussion, including advantages and disadvantages for each option, is provided in the enclosed rulemaking plan. A brief summary of each option is presented below.

Option 1 – Create a new NRC SNM categorization table, add a DPA requirement, and revise and consolidate current MC&A requirements in Part 74.

Under Option 1, the staff would: (1) revise Part 74 to create an SNM categorization table, including americium and neptunium; (2) require a DPA for certain types of licensees; (3) relocate MC&A requirements from Part 72 to Part 74; (4) add general performance objectives; (5) remove some exemptions; (6) add additional requirements for Categories I, II, and III facilities; and (7) make other miscellaneous changes. The major changes contemplated under this option are discussed in the following paragraphs.

First, a new NRC SNM categorization table would be added to Part 74. This would require: (1) modifying the SNM Category I – III threshold values; (2) adding subcategories for Categories I, II, and III to reflect attractiveness levels; (3) grading of the requirements within each

Category to reflect the attractiveness levels; (4) adding americium and neptunium; and (5) imposing SNM MC&A requirements on americium and neptunium. The table would be informed by the new proposed DOE material categorization table and would consider the chemical and physical properties, and forms, of SNM. This option would also result in revision of the requirements in each category (Categories I, II, and III) to address the subcategories that would be based on the attractiveness of the material. As an example, process monitoring would still be required for Category I materials; however, the actual frequency of the monitoring or quantity thresholds would be dependent on the attractiveness level. A higher attractiveness factor would result in more frequent and/or lower threshold monitoring than would a lower attractiveness factor. The advantages and disadvantages of adopting the proposed DOE categorization table will be provided in a separate Commission Paper to be provided by the Office of Nuclear Security and Incident Response (NSIR) in the late spring timeframe.

Second, Part 74 would be revised to require licensees that are authorized to operate enrichment and Category I fuel fabrication facilities undertake a DPA as part of a detection and response program. The DPA would focus on the internal threat aspects of protecting SNM and would identify conceivable and credible paths for the clandestine theft, diversion, or other misuses of SNM. In addition, licensees would be required to identify any countermeasures. Requiring a DPA would enhance existing facility detection and response programs. The staff estimates that it would cost approximately $100,000 per facility to conduct a DPA.

Third, MC&A requirements for SNM would be consolidated in Part 74. This would relocate to Part 74 the NMMSS-related reporting requirements for ISFSIs that are currently located in Part 72. In addition, Part 74 would be revised to make it clear what requirements apply to different types of facilities. Because the current general provisions do not include general performance objectives for the MC&A program, the staff plans to include general performance objectives that would apply to nearly all licensees. In addition, some current exemptions in the regulations would be deleted or modified. Part 74 would also be revised to include definitions for some new terms and to clarify the definitions of some terms. Terms such as item, material balance area, receipt, reconciliation, and waste would be added or clarified.

Part 74 would also be revised to add requirements related to the “two-person” rule and strengthen requirements related to tamper-indicating device programs. Other miscellaneous changes would also be made to Part 74 requirements for Categories I, II, and III facilities. Because it is hard to follow and understand some of the requirements, plain language revisions would be made to Subparts C, D, and E.

Under this option, staff would revise existing guidance documents and create a new DPA guidance document and a guidance document for Category II facilities for which no guidance document currently exists.

Option 1 would increase regulatory burden on existing licensees by increasing the level of protection required for certain materials, depending on the quantity and form of the material they possess, and by requiring that certain licensees undertake a DPA. However, this would better risk-inform MC&A programs and better reflect the synergy between physical protection and MC&A programs. The burden on NRC and Agreement State licensees that possess americium and neptunium would be increased. The proposed combination of changes would lead to greater protection of the public in the post-9/11 threat environment. There would be no direct impact on licensees that would prevent them from operating in a safe manner.

Option 2 – Rulemaking limited to adding a new NRC SNM categorization table.

Under Option 2, the staff would conduct a rulemaking to add a categorization table to Part 74 that reflects the relative attractiveness to potential adversaries of various SNM forms and would include americium and neptunium. Existing guidance would be revised to reflect the new table and its use. This option provides more protection for materials which could be used to fabricate INDs, and would largely align NRC regulations with the recently recommended DOE material categorization table. Since this option does not include the requirement for a DPA, it does not fully reflect the synergy between physical protection and MC&A programs.

This option could either increase or decrease regulatory burden on existing SNM licensees depending on the amount and form of their material holdings and would increase the burden on licensees possessing americium and neptunium. There would be no direct impact on licensees that would prevent them from operating in a safe manner. To a lesser degree than Option 1, Option 2 would make Part 74 more risk informed and would better ensure the secure use and management of radioactive materials. NRC's MC&A regulations would otherwise remain unchanged. Existing guidance documents would be revised to reflect the changes in requirements resulting from the new categorization. A guidance document for Category II facilities would also be developed.

Option 3 - Rulemaking limited to adding a DPA requirement.

Under Option 3, the staff would conduct a rulemaking to add a DPA requirement to the Part 74 regulations that would apply to enrichment facilities and Category I fuel fabrication facilities. New guidance would be developed regarding the conduct of a DPA. NRC's MC&A regulations would otherwise remain unchanged.

To a lesser degree than Option 1, Option 3 would make Part 74 more risk informed. This option would increase regulatory burden on Category I fuel fabrication and enrichment licensees. Compared to Option 1, Option 3 would reduce - but to a lesser extent - the risk that potential adversaries would gain access to materials conducive to making INDs.

Option 4 – Rulemaking limited to revising and consolidating current MC&A regulations in Part 74.

Under Option 4, MC&A requirements for SNM would be consolidated in Part 74. This would result in the relocation of the NMMSS-related reporting requirements for ISFSIs that are currently located in Part 72. In addition, Part 74 would be revised to make it clear what requirements apply to different types of facilities. The general provisions would be revised to include general performance objectives for the MC&A program that would apply to nearly all licensees. Some current exemptions in the regulations would be deleted or modified. Part 74 would be revised to include definitions for some new terms and to clarify the definitions of some terms. Terms such as item, material balance area, receipt, reconciliation, and waste would be added or clarified.

Part 74 would also be revised to add requirements related to the "two-person" rule and strengthen requirements related to tamper-indicating device programs. Other miscellaneous changes would also be made to Part 74 requirements for Categories I, II, and III facilities. Because it is hard to follow and understand some of the requirements, plain language revisions would also be made to Subparts C, D, and E.

Under this option, existing guidance would be revised to reflect any new requirements and a guidance document for Category II facilities would be developed.

Option 5 – Revise guidance documents but no rulemaking.

Under this option, the existing guidance documents would be revised to provide clarity as to what requirements apply to various facilities. The guidance documents would be revised to reflect new technologies in MC&A. There have been some significant advances in MC&A-related technologies and other modernizing methods and equipment (e.g., radio frequency identification, sensors, and measurement and monitoring systems) developed over the past 20 years. These improvements in technology should provide ample opportunity for more cost-effective systems capabilities and add flexibility for meeting general performance objectives. The staff would make other miscellaneous changes to address various issues that have arisen over time but have not warranted a revision to the regulations. The staff would also develop a guidance document for Category II facilities.

Option 6 – Maintain the status quo - no action.

Under the no action option, the staff would not make any changes to the regulations or guidance documents or develop any new guidance documents.

Agreement State Issues:

NRC staff has analyzed the proposed changes in accordance with the procedures established within Part III of the Handbook to Management Directive 5.9, "Categorization Process for NRC Program Elements." Staff has determined that the proposed rule would likely be classified as Compatibility Category "NRC." The NRC program elements in this category are those that relate directly to areas of regulation reserved to NRC by the Atomic Energy Act, as implemented in the provisions of Title 10 of the *Code of Federal Regulations*. Normally, there would be no interactions with the Agreement States for items classified as "NRC." In this case Agreement State licensees would be impacted by the changes related to americium and neptunium being treated as SNM, therefore, the proposed rule would be provided to the Agreement States for early input. The rulemaking plan was not provided to the Agreement States for comment due to the timing and uncertainty in the scope of the changes related to americium and neptunium and whether the Agreement States would be impacted.

COMMITMENTS:

The staff has committed to provide a Commission Paper that discusses the advantages and disadvantages of adopting the proposed DOE categorization table.

RECOMMENDATION:

The staff recommends that the Commission approve implementing Option 1. The proposed rule implementing this option would further risk-inform Part 74 and better ensure that SNM and other materials are protected from unauthorized diversion or theft. By taking into account the recommended revision to the DOE material categorization table, NRC's Part 74 regulations would provide enhanced protection for materials which could be used to fabricate INDs. Requiring a DPA for certain facilities would reflect the synergy between those facilities' physical

protection and MC&A programs. Further, by revising and consolidating NRC's MC&A requirements in one place, NRC will streamline its regulations so they are consistent throughout 10 CFR and are easier to understand.

RESOURCES:

The staff has estimated the resources to implement each of the four rulemaking options and the guidance development option. Staff resources are presented in full time equivalents (FTE) and contract support and travel (CS&T) dollars for the Offices of Federal and State Materials and Environmental Management Programs (FSME) and Nuclear Material Safety and Safeguards (NMSS). The resource requirements for the rulemaking and guidance development are presented in the table below. A breakdown by fiscal year (FY) assumes that work would begin in the fourth quarter of FY 2008, the majority of the work on the proposed rule would be in FY 2009, the majority of work on the final rule in FY 2010, and the final rule would be published in FY 2011. It is estimated that approximately 20 percent of the rulemaking resources would be expended in FY 2008, 40 percent in FY 2009, 20 percent in FY 2010, and 20 percent in FY 2011.

Option	Rulemaking		Guidance		Total	
	FTE	CS&T $	FTE	CS&T $	FTE	CS&T $
Option 1 – Create a new NRC SNM categorization table, add a DPA requirement, and revise and consolidate current MC&A requirements in Part 74						
FSME	1.6	$75,000		$0	1.6	$75,000
NMSS	1.0	$0	1.1	$640,000	2.1	$640,000
Other	0.6	$0	0.1	$0	0.7	$0
Total:	3.2	$75,000	1.2	$640,000	4.4	$715,000
Option 2 – Rulemaking limited to adding a new NRC SNM categorization table						
FSME	1.0	$0		$0	1.0	$0
NMSS	0.8	$0	0.6	$320,000	1.4	$320,000
Other	0.3	$0	0.1	$0	0.4	$0
Total:	2.1	$0	0.7	$320,000	2.8	$320,000
Option 3 - Rulemaking limited to adding a DPA requirement						
FSME	0.5	$0		$0	0.5	$0
NMSS	0.5	$0	0.3	$213,000	0.8	$213,000
Other	0.2	$0	0.1	$0	0.3	$0
Total:	1.2	$0	0.4	$213,000	1.6	$213,000
Option 4 – Rulemaking limited to revising and consolidating current MC&A regulations in Part 74						
FSME	1.1	$0		$0	1.1	$0
NMSS	0.8	$0	0.2	$200,000	1.0	$200,000
Other	0.5	$0	0.1	$0	0.6	$0
Total:	2.4	$0	0.3	$200,000	2.7	$200,000
Option 5 – Revise guidance documents but no rulemaking						
FSME	0.0	$0	0.0	$0	0.0	$0
NMSS	0.0	$0	0.2	$100,000	0.2	$100,000
Other	0.0	$0	0.1	$0	0.1	
Total:	0.0	$0	0.3	$100,000	0.3	$100,000

The resources for FY 2008 and FY 2009 are in the current budget. FSME budgeted 1.1 FTE in FY 2008 and 0.5 FTE in FY 2009 for the rulemaking effort plus $30,000 in FY 2009. NMSS has budgeted 0.2 FTE in FY 2008 and 0.7 FTE in FY 2009 for the rulemaking effort. Resources for FY 2010 and FY 2011 will be factored into the budget for those years. In addition, the staff may use contract support for development of the regulatory analysis; $30,000 is in the budget for FY 2009, the reminder will be budgeted in FY 2010. The resources for the guidance development have not been budgeted. However, the staff will undertake an add-shed exercise to support guidance development if the Commission approves going forward with the rulemaking.

In addition, the staff would incur costs to review licensee plans once the MC&A program was revised by the licensee. It is estimated that these costs would be between 0.05 FTE and 0.15 FTE per facility. These costs would be incurred in FY 2011 or FY 2012 depending on the effective date of the final rule. These costs would be factored into the budget for those years. Estimated costs to the industry are discussed in the enclosed rulemaking plan under each option.

Under Options 1 and 2, resources for conducting reviews and inspections of the MC&A programs for neptunium and americium would be necessary. The staff does not have an estimate at this time. Until a threshold value is established, the staff does not know how many licensees would be affected. In addition, NMMSS contract cost would increase due to the inclusion of americium and neptunium transactions. The cost increase would be dependent on the number of additional licensees reporting to the system.

The staff would hold at least one workshop/public meeting on the guidance documents under each of the four rulemaking options and the guidance development option. The costs for the workshop are included in the cost estimate for the guidance development.

COORDINATION:

The Office of the General Counsel has no legal objections to the rulemaking plan. The Office of the Chief Financial Officer has reviewed this Commission Paper for resource implications and has no objections.

The rulemaking plan working group included representatives from the Offices of FSME, NMSS, NSIR, Nuclear Reactor Regulation, International Programs, General Counsel, Administration, and Enforcement.

/RA/

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Enclosure: Rulemaking Plan

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Enclosure: Rulemaking Plan

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