

NRC INSPECTION MANUAL

DQASIP

INSPECTION PROCEDURE 85301

MC&A FOR IMPORTS AND EXPORTS

PROGRAM APPLICABILITY: 2681

85301-01 INSPECTION OBJECTIVE

Verify that material control and accounting procedures associated with the receipt and shipment of imports and exports of SNM are carried out in accordance with applicable NRC regulations and conditions specified in the import/export license.

85301-02 INSPECTION REQUIREMENTS

MC&A procedures for imports and exports should include the following shipping and receiving related elements for which the inspector should verify that:

02.01 Nuclear material transfer reports (DOE/NRC Form-741) are prepared and distributed as required. [70.54, 75.34]

02.02 Containers of SNM are protected with tamper-indicating seals. The integrity of all containers and seals is checked upon receipt for imports and prior to shipment for exports. The identity and quantity of contained SNM is reverified if tamper-safing is found to have been compromised. [70.51(f)(2)(ii), (iii); 73.26(g)(3)(c)(1)(i); 73.67(e)(5), (6), (1)(iii), (2)(i); 73.67(g)(4), (5), (1)(iii), (2)(i)]

02.03 Shipper-receiver differences are reviewed and evaluated as required, and appropriate, timely investigative and corrective actions are taken to reconcile differences which are statistically significant. [70.58(g)(2), (3); 73.67(e)(3)(vi); 73.67(g)(3)(iii)]

85301-03 INSPECTION GUIDANCE

03.01 Regulations. 70.51(f)(2)(ii), (iii); 70.54; 70.58(g)(2), (3); 73.26(g)(3), (c)(1)(i); 73.67(e)(5), (6), (1)(iii), (2)(i), (3)(vi); 73.67(g)(4), (5), (1)(iii), (2)(i), (3)(iii); 75.34.

03.02 References

Regulatory Guide 5.15 - Security Seals (1/74)
Regulatory Guide 5.28 - Evaluation of S/R Differences (6/74)
Regulatory Guide 5.57 - Shipping/Receiving Controls (6/80)

NUREG/BR-0006 - Material Transfer Report Instructions (4/83)
NUREG/CR-2820 - Resolution of S/R Differences (9/82)
NUSAC Report No. 790 - Analysis of S/R Differences (12/82)

03.03 Inspector Guidance. To begin with, the information and requirements contained in the import/export license should be reviewed and compared with the conditions which exist during the actual import or export of material. In addition, the integrity and identity of all containers and exterior seals should be checked. Interior seals might also be checked if available time and resources permit. If the integrity of seals or containers is found to be compromised, the licensee should be notified of the need to promptly reverify the contents of such items. Appropriate licensee action in such cases should be verified by a follow-up inspection.

After sufficient time has elapsed for the nuclear material transfer reports to be completed and distributed for the import/export, they should be inspected for compliance with applicable NRC requirements. Significant shipper-receiver differences should be evaluated by the inspector to assure that they have been appropriately investigated and resolved by the licensee. Since the inspection of measurements and other internal accounting procedures associated with imports and exports is adequately covered by routine MC&A inspections, further more intensive inspection effort related to independently verifying measured quantities for imports and exports is not warranted.

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