

# Domestic MC&A and Licensing

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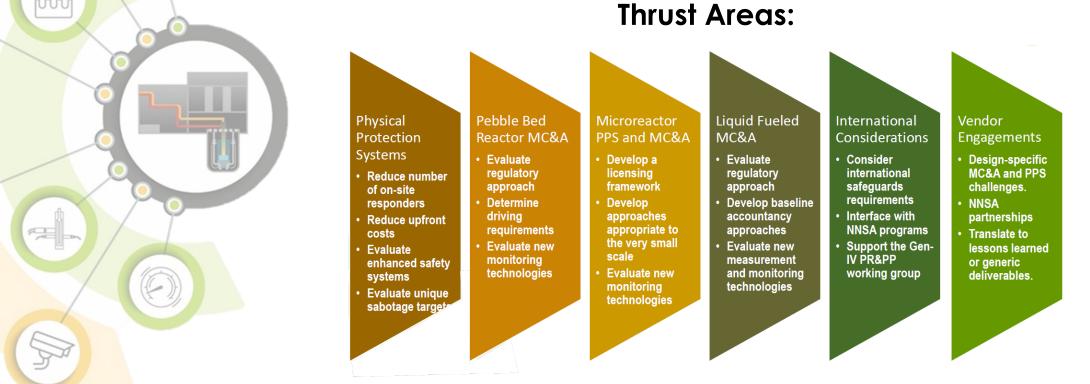
MSR Workshop Oct. 11, 2022

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# ARS Program under DOE NE-5

- Savannah Fitzwater (DOE PM) and Ben Cipiti (NTD @ SNL)
- "...focused on addressing near term challenges advanced reactor vendors face in meeting U.S. domestic Physical Protection System (PPS) and MC&A requirements."



**CAK RIDGE** National Laboratory

https://energy.sandia.gov/programs/nuclear-energy/safety-security-and-safeguards-foradvanced-nuclear-power/advanced-reactor-safeguards/

## NRC Regulations: 10 CFR

- Siting and construction: Part 50–Domestic Licensing of Production and Utilization Facilities or Part 52–Licenses, Certifications, and Approvals for Nuclear Power Plants.
- Part 70–Domestic Licensing of Special Nuclear Material (SNM)
   Part 74–graded requirements for the control and accounting of SNM

It is not expected that the regulations will be modified or that an exception will extend to liquid-fueled MSRs due to the significant difference in fuel form and other operational characteristics compared to solid fueled reactors with large assemblies.



- SNM defined as Pu, <sup>233</sup>U, or enriched uranium in mass 233 (<sup>233</sup>U) or 235 (<sup>235</sup>U)
  - Graded scale based on the ease with which it could be used by an adversary: low strategic significance (Cat III), moderate strategic significance (Cat II), or strategic SNM (Cat I).
- Material Control & Accountability (MC&A) and physical security ensure SNM is not stolen or diverted.
  - MC&A is based on performance objectives



 SNM defined as Pu, <sup>233</sup>U, or enrice or 235 (<sup>235</sup>U)

o≥2 kg Pu

 $\circ$ ≥5 kg <sup>235</sup>U (in U enriched to ≥20 wt%, i.e.,

highly enriched uranium (HEU))

 $\circ \ge 2 \text{ kg } {}^{233}\text{U}$   $\circ \ge 2 \text{ kg of a formula quantity} = (g)$   $\circ \ge 5 \text{ kg of a formula quantity} = (g)$  $\circ \ge 5 \text{ kg of a formula quantity} = 2.5 \times (g)^{233}\text{U} + g)$ 

- Graded scale based on the ease
   Contained 2000 + 2.5 × (g 2000 + g P)
   adversary: low strategic significance (Cat III), moderate strategic significance (Cat II), or strategic SNM (Cat I).
- Material Control & Accountability (MC&A) and physical security ensure SNM is not stolen or diverted.
  - MC&A is based on performance objectives



• SNM	Less than a formula quantity of strategic	ranium in mass 233 ( <sup>233</sup> U)
or 235 – Gra adv sign	<ul> <li>SNM but</li> <li>&gt;1 kg of <sup>235</sup>U (in U enriched to ≥20 wt%)</li> <li>&gt;0.5 kg of <sup>233</sup>U or Pu</li> </ul>	h it could be used by an III), moderate strategic Ice (Cat I).
• Mater securi	$^{233}$ U + g Pu) ■ ≥10 kg $^{235}$ U (in U enriched to ≥10 wt%	C&A) and physical rerted.

- MC&A is based on performance objectives



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- SNM defined as Pu, <sup>233</sup>U, or enriched or 235 (<sup>235</sup>U)
  - Graded scale based on the ease with adversary: low strategic significance ( significance (Cat II), or strategic signific
- Material Control & Accountability ( security ensure SNM is not stolen or
  - MC&A is based on performance object

Less than an amount of moderate strategic significant but:

- >15 g<sup>235</sup>U (in U enriched to ≥20 wt%)
  - ■>15 g of <sup>233</sup>U

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■>15 g of Pu
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 >15 g = (g contained <sup>235</sup>U) + (g Pu) + (g <sup>233</sup>U)

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\circ <10 kg but >1 kg of <sup>235</sup>U (in U enriched
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to \ge 10 \text{ wt\% but } < 20 \text{ wt\%}
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o≥10 kg <sup>235</sup>U (in U enriched above natural but <10 wt%)
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  - Graded scale based on the ease with which it could be used by an adversary: low strategic significance (Cat III), moderate strategic significance (Cat II), or strategic significance (Cat I).
- Material Control & Accountability (MC&A) and physical security ensure SNM is not stolen or diverted.
  - MC&A is based on performance objectives
- MC&A approach is proposed as a Fundamental Nuclear Material Control (FNMC) plan



## MSR Design Facility Components

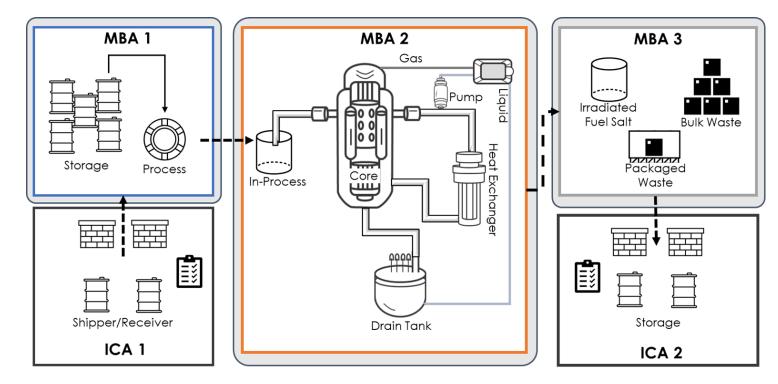
#### Considerations for FNMC plan

- Irradiated Fuel Salt highly radioactive preventing access could be used for reliance on containment and surveillance. Monitoring, sampling and measurement should be performed whenever possible. Sampling fuel salt can be used with modeling to provide a strong case to downgrade material and to perform dynamic inventories.
- Fresh Fuel TIDs used for fresh fuel containers. Facility needs a capability to measure material (UF<sub>4</sub>), enrichment, etc., to resolve any discrepancies resulting from gross weight inconsistency, seal failure, or excessive ID investigation. FNMC plan must include how material will be accounted for during online fueling.
- Reactor Containment Loop style compared to integral may provide greater access to SNM. All side streams (SNM) should be monitored and measured whenever possible. Provide a means to detect and quantify holdup of SNM.
- Wastes Fuel salt removed from containment should be sampled and measured to validate model. Equipment should be measured to quantify holdup. Transfer of SNM must be quantified with measurements.



# Proposed Boundary Approach

- Physical areas localize material inventories, and processing.
- Control SNM transfer from ICA→MBA, MBA→MBA, and MBA→ICA



- ICA internal control area: discrete item storage and inventories, TIDs, etc. no (or minimal) new measurements.
- MBA material balance area: for SNM processing CAK RIDGE and (re) measuring.

### Conclusions

- SNM is categorized and MC&A is moving towards performance based (as opposed to prescriptive).
- Liquid-fueled MSRs with circulating fuel will need to develop an FNMC plan for domestic licensing.
- FNMC considerations and suggestions for design specific components were provided.
- The MC&A approach should localize material inventories and processing of SNM.
- The generic framework presented should help guide the licensee in efforts to accommodate licensing requirements.



#### Acknowledgements

- DOE's ARS program for support to perform this research.
- The MC&A group at the NRC for their support and conversation.
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Questions?

