

MOX Fuel Fabrication Facility (MFFF) Regulatory Support



Don Williams, Oak Ridge National Laboratory
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AOP Task Description

- Support review of the MFFF design including technical assessments of plutonium fuel materials, regulatory management plan review (emphasis added), aqueous polishing of feed materials, and uranium supply issues [AOP Subtask 1.3 – Technical Support for MOX FFF Project (OPC)].





Importance of AOP Task to Program

- NRC licensing of a DOE facility under 10CFR70 is unprecedented.
- The requirements of 10CFR70 are evolving.
- The DCS Regulatory Management Plan (RMP) is a unique document.
- DOE/MD has limited experience with the NRC licensing process.
- DCS has limited experience with the 10CFR70 licensing process.
- As such, DOE/MD benefits from having ORNL personnel experienced with NRC licensing requirements and protocols involved in the review of MFFF regulatory issues.





Task Activities (Oct. 1998 - Dec. 1999)

- DOE RMP Review Team participation
- Review 10CFR70 rulemaking documentation for issues relevant to MFFF licensing
- Participation in DOE/DCS/NRC meetings on MFFF licensing
- Respond to information requests on MFFF licensing schedules and regulatory positions proposed by DCS



Future Task Activities (FY 2000/FY 2001)

- Complete RMP Review Team participation
- Participate in DOE/DCS/NRC meetings related to MFFF licensing
- Maintain cognizance of NRC regulatory activities relevant to MFFF licensing (including 10CFR70 rulemaking)
- Respond, as needed, to information requests on regulatory issues of potential relevance to MFFF licensing



Task Challenges

- Reaching a consensus on purpose/content of RMP
- Effecting a program-level focus on meeting NRC requirements in MFFF licensing interactions with NRC
- Maintaining awareness of developments in 10CFR70 rulemaking
- Being provided adequate time to review proposed presentations to NRC on MFFF licensing



Summary

- MFFF licensing is a “first-of-a-kind” activity in the U.S.
- NRC regulatory requirements in 10CFR70 are evolving.
- DOE/MD has limited experience with NRC licensing process.
- DCS has limited experience with 10CFR70 licensing process.
- ORNL’s contributions to the task have been viewed as adding value to DOE/MD’s understanding of NRC licensing requirements and protocols.
- As such, DOE/MD should continue to fund ORNL involvement in the MFFF regulatory support activity.

