

**Request for Additional Information (EPID L-2022-LLA-0177)**  
Westinghouse Hematite Ash Request (Part I)

By letter dated December 2, 2022, Westinghouse Electric Company, LLC (WEC) submitted a request for a temporary license amendment for storage of specific Hematite ash at its Columbia Fuel Fabrication Facility (CFFF) in Hopkins, South Carolina (Agencywide Documents Access and Management System [ADAMS] Accession No. ML22336A174).

**Regulatory Basis**

10 CFR 74.31(a) requires the licensee to implement and maintain a material control and accounting (MC&A) system that will achieve specific performance objectives. Particularly, 10 CFR 74.31(a)(1) requires that the licensee confirm the presence of special nuclear material (SNM). The principal methods of confirming the presence of SNM are to maintain current knowledge of the SNM currently in possession, and to periodically perform a physical inventory of the SNM. In accordance with 10 CFR 74.31(c)(6), the licensee is required to maintain current knowledge of items to provide timely, accurate, reliable information about the quantity and location of materials in their possession. In accordance with the requirements in 10 CFR 74.31(c)(5), the licensee is required to conduct a physical inventory that verifies the presence of all SNM it currently possesses as stated in its accounting records. In accordance with 10 CFR 74.31(c)(4), the licensee is required in each inventory period to control the total MC&A measurement uncertainty so that twice its standard of error is less than the greater of 9000 grams uranium-235 or 0.25 percent of the active inventory. In accordance with the requirements in 10 CFR 74.31(d), the licensee is required to establish and maintain records that demonstrate compliance with the requirements of 10 CFR 74.31(c).

**Request for Additional Information (RAI)**

- A) In the submittal letter, the licensee requests a temporary license condition to store the nine drums of incinerator ash for a duration not to exceed six months after issuance of the amendment. In Enclosures 1 and 2 of the submittal letter, the licensee provides specific information for the nine drums, including identification and quantity values for the drums and inner containers. However, it is unclear if the values provided in the enclosures, specifically in the table in Enclosure 2, are based on shipper's values or receiver measurements. Provide clarification for the basis of the values provided in Enclosure 2; whether these are the values that will be maintained for the requested duration of storage; and, if applicable, what values and measurement uncertainty will be used if the licensee's annual physical inventory occurs during the requested duration of storage.
  
- B) In Enclosure 2 of the submittal letter, the licensee indicates that the nine drums are currently stored in an intermodal container suspended off the ground on a flatbed container and will remain in their current configuration until a plan for further processing is submitted to the NRC. However, it is unclear how the integrity of the drums or the intermodal container is maintained for the requested duration of storage to preserve the current knowledge of the material. Provide a description of the measures in place to ensure that the integrity of the material is maintained for the duration of storage, and how the records for the material will be maintained.