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SAFEGUARDS & SECURITY STRATEGY

Safeguards & Security requirements are derived from the quantity and attractiveness of the material, as shown in Figures 1 and 2.

| | Attractiveness Level | Pu/U-233 Category (kg) | | | | Contained U-235/Separated Np-237/Separated Am-241 and -243 Category (kg) | | | | All E Materials Category IV |
|--|----------------------|------------------------|--------|----------|-----------------------|--|-------|--------|-----------------------|-----------------------------|
| | | I | II | III | IV ¹ | I | II | III | IV ¹ | |
| WEAPONS Assembled weapons and test devices | A | All | N/A | N/A | N/A | All | N/A | N/A | N/A | N/A |
| PURE PRODUCTS Pits, major components, button ingots, recastable metal, directly convertible materials | B | ≥2 | ≥0.4<2 | ≥0.2<0.4 | <0.2 | ≥5 | ≥1<5 | ≥0.4<1 | <0.4 | N/A |
| HIGH-GRADE MATERIALS Carbides, oxides, nitrates, solutions (≥25 g/L) etc.; fuel elements and assemblies; alloys and mixtures; UF ₄ or UF ₆ (≥ 50% enriched) | C | ≥6 | ≥2<6 | ≥0.4<2 | <0.4 | ≥20 | ≥6<20 | ≥2<6 | <2 | N/A |
| LOW-GRADE MATERIALS Solutions (1 to 25 g/L), process residues requiring extensive reprocessing; moderately irradiated material; Pu-238 (except waste); UF ₄ or UF ₆ (≥ 20% < 50% enriched) | D | N/A | ≥16 | ≥3<16 | <3 | N/A | ≥50 | ≥8<50 | <8 | N/A |
| ALL OTHER MATERIALS Highly irradiated forms, solutions (<1 g/L), uranium containing <20% U-235 or <10% U-233 ² (any form, any quantity) | E | N/A | N/A | N/A | Reportable Quantities | N/A | N/A | N/A | Reportable Quantities | Reportable Quantities |

¹The lower limit for Category IV is equal to reportable quantities in this Manual.

²The total quantity of U-233 = [Contained U-233 + Contained U-235]. The category is determined by using the Pu/U-233 side of this table.

Figure 1 Nuclear Material Safeguards Categories

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| Description/Form | MaximumSNM concentration* (wt%) for MC&A and physical protection termination | MaximumSNM concentration(wt%) for only physical protection equivalent to Category IV |
|--|---|--|
| | SNM solutions and oxides: nitrate, caustic or chloride solutions, contaminated/impure oxides, metal fines and turnings, glove box sweepings | 0.1 |
| SNM amenable to dissolution and subsequent separation: pyrochemical salts, chloride melt, hydroxide cake, floor sweepings, alumina, condensates reduction residues, sand, slag, and crucible, magnesium oxide crucibles spent fuel and spent fuel residues | 0.1 | 0.2 |
| SNM in organic matrixes or requiring mechanical separation disassembly and subsequent multiple recovery operations: HEPA filters, organic solutions, oils and sludges, graphite or carbon scrap, surface contaminated plastics, metal components, combustible rubber | 0.2 | 1.0 |
| SNM bound in matrix of solid, sintered, or agglomerated refractory materials: SNM embedded in glass or plastic, high-fired incinerator ash, spent resins, salt sludges, raffinates, and sulfides | 0.5 | 2.0 |
| SNM microencapsulated in refractory compounds or in solid-dilution: vitrified, bituminized, cemented, or polymer-encapsulated materials, SNM alloyed with refractory elements (tungsten, platinum, chromium, stainless steel); ceramic/glass salvage | 1.0 | 5.0 |

*SNM weight percent is based on element weight for Plutonium and isotope weight for U-235 and U-233.
Source: DOE-STD-1194-2011

Figure 2 Additional Attractiveness Level E Criteria for SNM

1.1 Receipt and Storage

Each cask of both AVR and THTR fuel holds pebbles that contain Special Nuclear Material (SNM) bound in a matrix of sintered refractory material. The SNM concentration is less than 0.5 wt% for all casks; hence, each cask is Attractiveness Level E. Therefore, all 455 casks *in toto* will constitute a Category IV quantity of SNM and will be protected as such in the L-Area Property Protection Area (PPA) as per DOE Order 473.3, *Protection Program Operations*,

Storage requirements Category IV Quantities of SNM:

Storage. Category IV quantities of SNM must be stored in a locked area within at least a PPA, and procedures must be documented in an approved site security plan (SSP).

Intrusion Detection System for Category IV quantities of SNM.

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PROTECTING SPECIAL NUCLEAR MATERIAL. Intrusion detection and assessment systems and/or *visual observations by protective force (PF) personnel must be used to protect SNM and classified matter to ensure breaches of security barriers or boundaries are detected and alarms annunciate.*

Lock and Keys

Level III. Buildings, gates in fences, cargo containers, and storage areas protecting Category IV SNM, and government property whose loss would adversely impact security and/or site/facility operations require Level III security locks and keys.

Storage in L-Area Property Protection Area (PPA)

The security strategy for the storage of CASTOR casks in the L-Area PPA:

- The casks will be stored on a crusher run pad in the L-Area PPA.
- The pad will include fencing, Level III locks, and lighting.
- Protective force patrols will be conducted on a routine basis.

1.2 Processing

The Safeguards & Security objective for fuel processing is to maintain the SNM at Attractiveness Level D. This can be accomplished by:

- Ensuring solution concentrations are < 25 g/l SNM
- Ensuring solids are < 10 weight % SNM (achieved in most cases by not separating thorium from uranium)
- Down blending HEU to Attractiveness Level E with NU or DU
- Avoiding the production of SNM in metal form
- Avoiding the production of HEU oxide

The separated kernels recovered from the carbon digestion are Attractiveness Level D, and cannot roll up to a Category I quantity. If an L Area option is selected, the process equipment will be located inside the 105-L Building, which is inside a Protected Area. For an H Canyon option, an assessment will be required to ensure the adequacy of kernel storage within the process cell area.

All waste streams will be Attractiveness Level E prior to discharge from the process facility for final treatment.