SUMMARY OF CHANGES FOR AP LOCATION FORMS

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| **Reference** | **Original Text** | **Revised Text** | **Reasons** |
| Section 2 – Report Types – INITIAL REPORT | For the calendar year in which the DOC APR is promulgated, you must submit an Initial Report (DOC/NRC Forms AP-1, AP-2, and required activity forms) to BIS within 30 days after promulgation of the final BIS regulations for all nuclear fuel cycle-related activities that are active as of the publication date. | You must submit an Initial Report to BIS by January 31st, if you commenced nuclear fuel cycle-related activities during the previous calendar year, and have not previously reported activities to BIS. | The APR was promulgated 3 years ago. Initial Report within the context of regulations promulgation is no longer applicable. Any activity that had not been submitted previously now must be reported as Initial Report.  |
| Section 2 – Report Types – **NO CHANGES REPORT** | If all of the information provided in your most recently submitted report has not changed, you may submit a No Changes Report (Form AP-17) in lieu of an Annual Update Report. | If all of the information, including contact information and other administrative information on AP-1 and AP-2, provided in your most recently submitted report has not changed, you may submit a No Changes Report (Form AP-17) in lieu of an Annual Update Report. | To clarify that contact information and other administrative information must also remain the same as a requirement for filing the NO CHANGE REPORT. |
| Section 2 – Report Types – AMENDED REPORT | Changes to previously submitted information must be submitted on an Amended Report. Corrections to information regarding a reportable activity and corrections or changes to company information (e.g., corrections to address, changes in contact information, etc.) must be submitted on an Amended Report within 30 calendar days after the information has changed or the error identified. Amendments to your previously reported information resulting from an IAEA complementary access must be submitted on an Amended Report within 30 calendar days after receipt of a post-complementary access letter from DOC or NRC.  | Changes to previously submitted information must be submitted on an Amended Report. Corrections to information regarding a reportable activity and corrections or changes to company information (e.g., corrections to address, changes in contact information, etc.) must be submitted using the same AP Forms used previously and the corrections must be submitted within 30 calendar days after the information has changed or the error identified. Amendments to previously reported information resulting from an IAEA complementary access must be submitted using the same AP Forms used previously and the corrections must be submitted within 30 calendar days after the date of the complementary access. Any amended AP Forms should be accompanied with a cover letter addressing the specific change made. If additional information is requested during a complementary access, beyond what is submitted as part of the annual update, Form AP-15 should be used unless a preferred alternative is agree upon by either the Department of Commerce or the Nuclear Regulatory Commission. | Additional information clarity |
| Table 1 – Initial Report – Due Date | For the calendar year in which the APR is promulgated, you must submit an Initial Report to BIS within 30 days after promulgation of the final BIS regulations for all nuclear fuel cycle-related activities that are active as of the publication date.For any calendar year that follows the APR publication, you must submit an Initial Report to BIS by January 31st , if you commenced nuclear fuel cycle-related activities during the previous calendar year, and have not previously reported activities to BIS. | January 31st if you commenced nuclear fuel cycle-related activities during the previous calendar year and have not previously reported activities to BIS. | The APR was promulgated 3 years ago. Initial Report within the context of regulations promulgation is no longer applicable. Any activity that had not been submitted previously now must be reported as Initial Report. |
| AP-1 ( Instruction)– NO CHANGES REPORT | **NO CHANGES REPORT**: If the information provided in your most recently submitted report has not changed, you may submit a No Changes Report in lieu of an Annual Update Report  | Deletion | The text is not applicable (not used) for AP-1 |
| AP-6.2 | Ceased Activity (Closed down) | Ceased Activity |  |
| AP-6.4 | Operating (mine that produces ore on a routine basis) Suspended (mine or its infrastructure is capable of operation but production has ceased) Closed-down (production has ceased and mine or its infrastructure is not capable of further operation) |  Operating  Closed-down  Decommissioned | The Operational Status of the Mine is changed to be consistent with the revised IAEA Guidelines. The definition for each term is specified in the Form Instruction and the Glossary of Terms (Supplement 1). |
| AP-6.5 | Annual Uranium Production Capacity (in metric tons): | Annual Elemental Uranium Production Capacity (in metric tons): | For clarification the word “elemental” is added so that the production as reported should reflect the actually quantity of Uranium metal within the ore extracted, not the ore material itself from the mine. |
| AP-6 (Instruction), Question 6.4  | **Operational Status:** Check the appropriate box to indicate the current operational status of the mine | **Operational Status:** Check the appropriate box to indicate the current operational status of the mine: “Operating” for mine or plant producing ore in any quantity, “Closed-down” for mine or plant not operating but not fully decommissioned, and “Decommissioned”.Note: “Decommissioned” mine or plant is reported only once. | The Operational Status of the Mine is changed for consistency with the revised IAEA Guideline. |
| AP-6 (Instruction), Question 6.5 |  **Mine Production:** Provide the design-basis annual production capacity for uranium or thorium at the mine in metric tons, rounded to the nearest ten if the amount is 10 metric tons or more (e.g., 27 to 30, 148 to 150, 1525 to 1500, 15782 to 16000, etc.). If the amount is less than 10 metric tons report that exact number (e.g., 2, 4, 9, etc.). Also provide the actual annual production during the reporting period, rounded to the nearest ten percent. Closed-down mines and plants have a production capacity of zero. | **Mine Production:** Provide the design-basis annual production capacity for elemental uranium or thorium at the mine in metric tons, rounded to the nearest ten if the amount is 10 metric tons or more (e.g., 27 to 30, 148 to 150, 1525 to 1500, 15782 to 16000, etc.). If the amount is less than 10 metric tons report that exact number (e.g., 2, 4, 9, etc.). Also provide the actual annual production during the reporting period, rounded to the nearest ten percent. Closed-down mines and plants have a production capacity and annual production quantity of zero. | The word “elemental” for clarity. See “Reason” for AP-6.5 above.  |
| AP-7.5 |  Operating ( plant that operates on a routine basis) Suspended (plant is capable of operation but production has ceased) Closed-down (production has ceased and plant is not capable of operation) |  Operating  Closed-down Decommissioned | The Operational Status of the Plant is changed to be consistent with the revised IAEA Guideline. The definition for each term is specified in the Instruction Form and the Glossary Section. |
| AP-7.6 | Annual Uranium Production Capacity (in metric tons):  | Annual Elemental Uranium Production Capacity (in metric tons):  | For clarification the word “elemental” is added so that the production as reported should reflect the actually quantity of Uranium metal  |
| AP-7.7 | Annual Thorium Production Capacity (in metric tons):  | Annual Elemental Thorium Production Capacity (in metric tons):  | For clarification the word “elemental” is added so that the production as reported should reflect the actually quantity of Thorium metal  |
| AP-7, Question 7.3 (Instruction) | **Place Where Activity Occurs:** Identify building name(s)/number(s) and any additional information that may more precisely define where the reported activity occurs (e.g. room numbers). If many rooms are used, you may describe areas within the building (e.g. 1st floor of the north wing). | **Building information:** Identify building name(s)/number(s) and any additional information that may more precisely define where the reported activity occurs (e.g. room numbers). If many rooms are used, you may describe areas within the building (e.g. 1st floor of the north wing). Satellite extraction facilities should be reported separately from centralized processing facilities. | For consistency with the terminology “Building Information” used in the Form AP-7.3, and clarification of the reporting requirement for satellite extraction facilities. |
| AP-7, Question 7.5 (Instruction) | **Operational Status:** Check the appropriate box to indicate the current operational status of the concentration plant.  | **Operational Status:** Check the appropriate box to indicate the current operational status of the concentration plant: “Operating” for plant producing ore in any quantity, “Closed-down” for plant not operating but not fully decommissioned, and “Decommissioned”. Note: “Decommissioned” plant is reported only once. | The Operational Status of the Plant is changed to be consistent with the revised IAEA Guidelines. The definition for each term is specified in the Instruction Form and the Glossary of Terms (Supplement 1). |
| AP-7 (Instruction) Question 7.6 & 7.7  | **Production Capacity:** Provide the design-basis annual production capacity of uranium and/or thorium at the concentration plant in metric tons, rounded to the nearest ten if the amount is ten metric tons or more (e.g., 27 to 30, 142 to 140, 1525 to 1500, 15782 to 16000, etc.). If the amount is less than 10 metric tons report that exact number (e.g., 2, 5, 9, etc.). Also provide the actual annual production during the reporting period, rounded to the nearest ten percent. Closed-down plants have a production capacity of zero. | **Production Capacity:** Provide the design-basis annual production capacity of elemental uranium and/or thorium at the concentration plant in metric tons, rounded to the nearest ten if the amount is ten metric tons or more (e.g., 27 to 30, 142 to 140, 1525 to 1500, 15782 to 16000, etc.). If the amount is less than 10 metric tons report that exact number (e.g., 2, 5, 9, etc.). Also provide the actual annual production during the reporting period, rounded to the nearest ten percent. Closed-down plants have a production capacity and annual production quantity of zero. | For clarification |
| AP-8 (Instruction) Question 8.3(b) | **Quantity on Hand (MT):** Provide the quantity of source material (in metric tons U or Th) present at your location as of the date specified in the notification of reporting requirements letter received from NRC, if you are submitting as Initial Report. If submitting an Initial Report after the collection date or an Annual Update Report, provide the quantity of source material present at your location as of the preceding December 31 in metric tons. | **Quantity on Hand (MT):** Provide the quantity of source material (in metric tons of elemental U or Th) present at your location as of the date specified in the notification of reporting requirements letter received from NRC, if you are submitting as Initial Report. If submitting an Initial Report after the collection date or an Annual Update Report, provide the quantity of source material present at your location as of the preceding December 31 in metric tons | For clarification |
| AP-13 (Instruction) Question 13.3 | **Identify Exported Item(s):** Provide, as appropriate, item dimensions, capacity (volume), throughput, material of construction, identification or serial numbers, name and address of the manufacturer, key specifications of non-nuclear material, and any other information that will help identify the item(s). | **Identify Exported Item(s):** Provide, as appropriate, item dimensions, capacity (volume), throughput, material of construction, identification or serial numbers, name and address of the manufacturer, key specifications of non-nuclear material, and any other information that will help identify the item(s) including units on all measurements.  | For clarification. |
| AP-17.3 | I hereby certify that the information reported in last year’s Initial, Annual Update, Amended, or No Changes Report is unchanged for the reporting year listed in Question 16.4 below. To the best of my knowledge and belief, the submitted information is true and complete. | I hereby certify that the information reported in last year’s Initial, Annual Update, Amended, or No Changes Report is unchanged for the reporting year listed in Question 17.4 below. To the best of my knowledge and belief, the submitted information is true and complete. | To correct a typo |
| AP-17 – **INSTRUCTIONS** | Submit this No Changes Report form in lieu of an Annual Update Report to certify that all of the information reported in the last submitted Initial, Annual Update, Amended or No Changes Report for your location has not changed. If you have not previously submitted a report, you may not use this form. A No Changes Report may only be submitted if all previously reported information (i.e., POC, address, activity) has not changed). | Submit this No Changes Report form in lieu of an Annual Update Report to certify that all of the information (including POC, address and activity) reported in the last submitted Initial, Annual Update, Amended or No Changes Report for your location has not changed. If you have not previously submitted a report, you may not use this form. A No Changes Report may only be submitted if all previously reported information (i.e., POC, address, activity) has not changed). | For clarification |
| Supplement 1 – GLOSSARY OF TERMS: **Operational Status of a Plant or Mine:** | **Operating** A plant or mine that operates on a routine basis. **Suspended** A plant or mine that is capable of operation but where production is not occurring.**Closed-down** A plant or mine that is not capable of operation and where production has ceased. | **Operating** A plant or mine that produces ore materials. **Closed-down** A plant or mine that is not operating but not fully decommissioned.**Decommissioned** A plant or mine that was decommissioned. | The definition on status of operation is changed to be consistent with the IAEA Guidelines for AP Declarations. |