
**OFFICE OF
THE INSPECTOR GENERAL
U.S. NUCLEAR
REGULATORY COMMISSION**

Audit of NRC's Management of
Import/Export Authorizations

OIG-04-A-19 September 13, 2004

AUDIT REPORT



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September 13, 2004

MEMORANDUM TO: Luis A. Reyes
Executive Director for Operations

Janice Dunn Lee
Director, Office of International Programs

FROM: Stephen D. Dingbaum/**RA**
Assistant Inspector General for Audits

SUBJECT: AUDIT OF NRC'S MANAGEMENT OF
IMPORT/EXPORT AUTHORIZATIONS
(OIG-04-A-19)

Attached is the Office of the Inspector General's audit report titled *Audit of NRC's Management of Import/Export Authorizations*.

The report reflects the results of our audit to determine whether the Office of International Programs was (1) properly reviewing and approving import/export authorizations in a timely manner, (2) effectively coordinating this activity with other Federal agencies, and (3) efficiently and effectively coordinating import/export authorizations internally. The audit found that the Office of International Programs approved license applications in a timely manner in compliance with Title 10 of the Code of Federal Regulations, Part 110 and effectively coordinated with other Federal agencies. However, license processing costs are under-recovered and the internal coordination relating to the proper review and approval of import/export license applications requires improvement to correct documentation weaknesses.

This report makes recommendations to address the issues identified by enhancing management controls.

Comments provided at the August 10, 2004, exit conference, and via subsequent e-mails, have been incorporated, as appropriate, in our final report.

If you have any questions or wish to discuss this report, please call me at 415-5915 or Steven Zane at 415-5912.

Attachment: As stated

cc: W. Dean, OEDO

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EXECUTIVE SUMMARY

BACKGROUND

The Atomic Energy Act of 1954, as amended, assigns responsibility for licensing imports and/or exports of specified nuclear materials and equipment to the U.S. Nuclear Regulatory Commission (NRC). Title 10 of the Code of Federal Regulations, Part 110 (10 CFR 110) contains the regulations that prescribe licensing, enforcement, and rulemaking procedures. NRC's Office of International Programs (OIP) administers the agency's import/export licensing program. In carrying out this responsibility, NRC coordinates with other Executive Branch agencies such as the Departments of State and Energy, which review license applications forwarded by OIP. NRC has historically processed approximately 100 import/export license applications per year, but this is expected to increase to about 280 in FY 2005.

PURPOSE

The objectives of this audit were to determine whether OIP was (1) properly reviewing and approving import/export authorizations in a timely manner, (2) effectively coordinating this activity with other Federal agencies, and (3) efficiently and effectively coordinating import/export authorizations internally.

RESULTS IN BRIEF

The audit found that OIP approved license applications in a timely manner in compliance with 10 CFR 110 and effectively coordinated with other Federal agencies. However, license processing costs are under-recovered and the internal coordination relating to the proper review and approval of import/export license applications requires improvement to correct documentation weaknesses.

License Processing Costs are Under-Recovered

Although Federal laws and regulations require recovery of the full cost of processing import/export license applications via fees (hereafter referred to as flat fees), NRC under-recovered the full cost of processing these applications. The agency's calculation of flat fees, fails to accurately estimate the hours used, resulting in under-recovered costs of approximately \$800,000 in FY 2002 and

approximately \$600,000 in FY 2003. In the instance of under-recovered costs, NRC recoups the under-recovery via the General Fund and/or the annual fees charged to the agency's other licensees.

Quality Control Process Needs Improvement

NRC properly reviewed and approved 96 percent of the FY 2003 import/export license applications. However, four of the ninety-eight applications reviewed during this audit were not fully documented in NRC's files. These exceptions were caused in part by the lack of written quality control procedures and checklists and in part by the lack of a provision allowing issuance of licenses based on verbal approvals.

RECOMMENDATIONS

The report makes recommendations to the Director, OIP to enhance management controls.

AGENCY COMMENTS

During an exit conference on August 10, 2004, NRC staff generally agreed with the findings and recommendations in this report (except as explained below) and provided comments to clarify certain sections. We modified the report, as we determined appropriate, in response to those comments. Management chose not to provide written comments for inclusion in this report.

Management expressed concerns about the accuracy of the estimated under-recovered costs of processing import/export license applications for FYs 2002 and 2003. The calculations are estimates based on the best information available in NRC's books and records.

ABBREVIATIONS AND ACRONYMS

ADAMS	Agency-wide Documents Access and Management System
10 CFR 110	Title 10 of the Code of Federal Regulations Part 110
10 CFR 170	Title 10 of the Code of Federal Regulations Part 170
IAEA	International Atomic Energy Agency
IOAA	The Independent Offices Appropriations Act of 1952
NMSS	Office of Nuclear Material Safety and Safeguards
NRC	U.S Nuclear Regulatory Commission
NSIR	Office of Nuclear Security and Incident Response
OBRA 90	The Omnibus Budget Reconciliation Act of 1990
OCFO	Office of the Chief Financial Officer
OGC	Office of the General Counsel
OIG	Office of the Inspector General
OIP	Office of International Programs

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I. BACKGROUND

The Atomic Energy Act of 1954, as amended, assigns responsibility for licensing imports and/or exports of specified nuclear materials (including, but not limited to byproduct material,¹ source material,² and special nuclear material³) and equipment, such as coolant pumps, and spare and replacement parts, to the NRC. 10 CFR 110 contains the regulations that prescribe licensing, enforcement, and rulemaking procedures. NRC's OIP administers the agency's import/export licensing program. In carrying out this responsibility, NRC coordinates with other Executive Branch agencies such as the Departments of State and Energy, which review license applications forwarded by OIP.

NRC's licensing authority includes: nuclear reactors, source and special nuclear materials, heavy water, nuclear grade graphite, and radioactive waste. In addition to OIP, other NRC offices process license applications. The Office of Nuclear Security and Incident Response (NSIR) provides assurance that international safeguards and physical security at recipient sites meet International Atomic Energy Agency (IAEA) criteria. The Office of Nuclear Material Safety and Safeguards (NMSS) provides advice concerning imports of radioactive waste and the Office of the General Counsel (OGC) assists with legal matters pertaining to significant license applications.

OIP has five employees that process import/export license applications. In addition, NSIR, NMSS and OGC each devote less than one person per year to license processing. The Commission expects to issue a proposed regulation change that would increase control of specified nuclear byproduct materials by requiring import/export license applications for certain nuclear materials not previously requiring a license application (such as Cesium-137 and

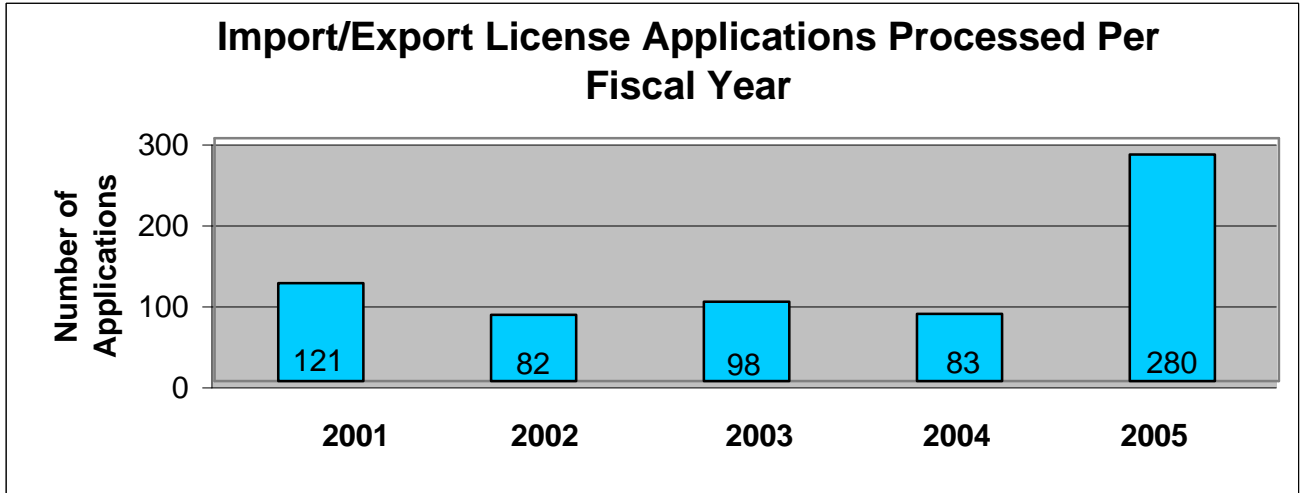
¹ Byproduct material – (1) Any radioactive material (except special nuclear material) yielded in or made radioactive by exposure to the radiation incident to the process of producing or utilizing special nuclear material and (2) the tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content. [Source: Atomic Energy Act of 1954, Section 11 (e)]

² Source material – Uranium or thorium or any combination thereof, in any physical or chemical form; or ores that contain by weight 0.05 percent or more of (1) uranium, (2) thorium, or (3) any combination thereof. Source material includes depleted uranium and natural uranium, but not “special nuclear material.” [Source: Title 10 CFR Part 40.4]

³ Special nuclear material – Plutonium, uranium-233, uranium enriched in the isotopes uranium-233 or uranium-235, and any other material which the Commission, pursuant to the provisions of Section 51 of the Atomic Energy Act of 1954, as amended, determines to be special nuclear material, but does not include source material; or any material artificially enriched by any of the foregoing, but does not include source material. [Source: Title 10 CFR Part 74.4]

Iridium-192). OIP expects that the regulation change, if approved, would dramatically increase the current level of import/export applications by two or three times in FY 2005.

The chart below shows the number of import/export license applications processed during FYs 2001 through 2003. The FY 2004 information is a projection based on nine months data and the FY 2005 figure is an estimate obtained from an OIP official.



II. PURPOSE

The objectives of this audit were to determine whether OIP was (1) properly reviewing and approving import/export authorizations in a timely manner, (2) effectively coordinating this activity with other Federal agencies, and (3) efficiently and effectively coordinating import/export authorizations internally.

III. FINDINGS

The audit found that OIP approved license applications in a timely manner in compliance with 10 CFR 110 and effectively coordinated with other Federal agencies. However, license processing costs are under-recovered and the internal coordination relating to the proper review and approval of import/export license applications requires improvement to correct documentation weaknesses.

A. LICENSE PROCESSING COSTS ARE UNDER-RECOVERED

Although Federal laws and regulations require recovery of the full cost of processing import/export license applications via fees, NRC under-recovered the full cost of processing these applications. Applicants for import/export licenses pay flat fees that fall into one of five categories.⁴ To develop these flat fees, OIP provides the Office of the Chief Financial Officer (OCFO) with the estimated average hours spent processing each category of license. The estimated hours for each fee category, multiplied by the materials rate⁵ (developed in accordance with Title 10 of the Code of Federal Regulations, Part 170 (10 CFR 170)), determine the fees charged. The agency's calculation of flat fees, while properly using the materials rate, fails to accurately estimate the hours used, resulting in under-recovered costs of approximately \$800,000 in FY 2002 and approximately \$600,000 in FY 2003⁶. In the instance of under-recovered costs, NRC recoups the under-recovery via the General Fund and/or the annual fees charged to the agency's other licensees.

Applicable Laws and Regulations

NRC's authority to charge fees derives from the Independent Offices Appropriations Act of 1952 (IOAA) and the Omnibus Budget Reconciliation Act of 1990 (OBRA 90), both of which provide a statutory basis for the flat fees charged to obtain an import/export license. Excerpts from these laws, as well as from 10 CFR 170, which deals with the flat fees for import/export licenses, follow.

The Independent Offices Appropriations Act of 1952

The IOAA states: "The head of each agency...may prescribe regulations establishing the charge for a service or thing of value provided by the agency...Each charge shall be—(1) fair; and (2) based on — (A) the costs to the Government...."

The Omnibus Budget Reconciliation Act of 1990

The OBRA 90 Conference Report states NRC User Fees, "must reasonably be related to the regulatory service provided by the NRC and fairly reflect the cost to the NRC of providing the service."

⁴ Appendix B lists the five import/export license fee categories along with the associated fees.

⁵ OCFO develops the materials rate.

⁶ See the subsection titled Under-Recovery of Costs for further discussion of these estimated shortfalls.

Title 10 of the Code of Federal Regulations, Part 170

10 CFR 170.12(b)(1) states: "Licensing fees will be assessed to recover full costs for - (i) The review of applications for new licenses and approvals; (ii) The review of applications for amendments to and renewal of existing licenses or approvals"...

10 CFR 170.12(b)(2) further states: "Full cost fees will be determined based on the professional staff time...expended. The full cost fees for professional staff time will be determined at the professional hourly rates in effect at the time the service was provided."

Calculation of Flat Fees Is Deficient

Currently, NRC does not fully adhere to the requirements of IOAA, OBRA 90, and 10 CFR 170, because the calculation of flat fees is deficient. Specifically, NRC needs to:

- Improve procedures for estimating total hours per license,
- Provide clear guidance on time charging, and
- Perform monitoring.

Procedures for Estimating Total Hours per License

The agency's calculation of flat fees, while properly using the materials rate, fails to accurately estimate the hours used to process import/export license applications. OIP's estimates of hours date back to 1991 and continue to be used today. OIP and OCFO representatives could not explain the sketchy documentation supporting the 1991 estimates. To develop accurate estimates based on current processing times, OIP needs to properly record and use actual hours expended by agency staff in processing import/export license applications.

Guidance on Time Charging

Until recently, OIP staff charged their time processing import/export license applications, regardless of fee category, to a single time code titled "Import/Export Licensing Reviews." As a result, OIP did not distinguish between times spent on each of the five fee categories. Furthermore, OIP did not provide clear guidance to

NRC staff on time charging. Specifically, the time charged to the one time code reflects only the time charged by OIP staff and excludes direct time processing applications expended by representatives of other NRC offices (OGC, NSIR, and NMSS⁷).

Beginning in May 2004, OIP staff discontinued the use of the single time code and began charging their time spent processing import/export license applications to eleven time codes.⁸ These added time codes represent an attempt by OIP to accumulate hourly data for further analysis in refining the calculation of flat fees. The new time codes, however, fail to accumulate hours in a manner that corresponds with the five existing fee categories. The lack of correlation between time codes and fee categories prevents OIP from using the hours expended in developing accurate license application fees.

Monitoring

To ensure that import/export license fee computations reflect current, accurate, and complete information, OIP needs to perform monitoring in the course of normal operations. Specifically, OIP should periodically compare flat fees collected with the full cost of processing import/export license applications and make adjustments to the flat fees as warranted. Office of Management and Budget Circular A-123, revised, *Management Accountability and Control*, requires management controls, which reasonably ensure that “reliable and timely information is obtained, maintained, reported and used for decision making.”

Under-Recovery of Costs

The agency's calculation of flat fees resulted in shortfalls of approximately \$800,000 in FY 2002 and approximately \$600,000 in FY 2003. Stated differently, the fees collected for import/export license applications are less than the costs of processing them. During FYs 2002 and 2003, the import/export license application fees collected by NRC represented only 15 percent and 28 percent of the processing costs, respectively. As a result, NRC had to recover the shortfalls via the General Fund and/or the annual fees charged to the agency's other licensees.

⁷ However, as part of the Biennial Review of Fees, OCFO works with NMSS and NSIR to identify their direct time spent on import-export licenses and includes estimates of these hours in the flat fees for these licenses.

⁸ Appendix C lists the eleven time codes currently used by OIP.

The aforementioned shortfalls are estimates based on the best information available in NRC's books and records. Due to limitations in NRC's data, characteristics of the estimates may, in some instances, be under or overstated.⁹

RECOMMENDATION

The Office of the Inspector General (OIG) recommends that the Director of the Office of International Programs:

1. Develop and implement a written methodology for the annual calculation of import/export license application fees that provides for correlation between time codes and fee categories and results in the development of fair and equitable license application fees that recover the agency's full cost of processing the applications.

B. QUALITY CONTROL PROCESS NEEDS IMPROVEMENT

NRC properly reviewed and approved 96 percent of the FY 2003 import/export license applications. However, four of the ninety-eight applications reviewed during this audit were not fully documented in NRC's files. Current licensing procedures require that the OIP licensing staff receive a memo from NSIR indicating that the international safeguards and physical security review had been performed and the criteria for approval had been met. Reportedly, in two cases, the OIP licensing staff issued the license based on verbal approval, contrary to the licensing procedure. In one case, there was no memo providing formal approval. In the second case, the memo was dated four days after the license was issued. These exceptions were caused in part by the lack of written quality control procedures and checklists and in part by the lack of a provision allowing issuance of licenses based on verbal approvals.

⁹ The shortfalls may be overstated because the OIP staff charged their time spent on all licensing related matters to a single time code, the hours collected include time spent on rulemaking, general correspondence, answering requests for information, and interagency and international meetings, which cannot be billed to licensees. However, because the only hours available are the aggregate hours, those were used to calculate the recovery of costs. The shortfalls may be understated, as the effort of other NRC offices (OGC, NSIR, NMSS) isn't included in the single time code that was used by OIP personnel. The shortfalls may be further understated, as our analysis did not include the OIP effort for October 2001, which was not available.

The failure to use a checklist can result in quality control weaknesses, which, in turn, could lead to the granting of an import/export license without proper review and approval. Such circumstances could increase the vulnerability to the agency if there is a loss of control over specified nuclear material.

Applicable Regulations and Agency Policy

The review of import/export license applications is required by 10 CFR 110. To comply with international safeguards and physical security requirements, OIP relies on evaluations from NSIR, which provides assurance that international safeguards and physical security at recipient sites meet International Atomic Energy Agency standards. OIP Policies and Procedures No.15 (effective August 1993) specifies that prior to being issued, license applications must be maintained in the Public Document Room for a 15-day period for public comment. The Agency-wide Documents Access and Management System (ADAMS) has become the forum through which the public can access import/export license applications. This policy gives the public an opportunity to express their views on the granting of a particular import/export license.

Compliance Exceptions

Compliance testing of NRC's processing of the ninety-eight FY 2003 import/export license applications disclosed four exceptions.

- Two exceptions occurred because of inadequate documentation of the review required under the international safeguards and physical security requirements of 10 CFR 110.
- A third exception resulted from an inconsistency in the license regarding the amount of source material approved for export. The differing quantities within the license could cause confusion regarding the correct amount of source material to be exported.
- The fourth exception relates to NRC's failure to include a license application in ADAMS for public comment. Such action precluded the public from expressing any objections to the proposed export.

A more detailed description of the first two exceptions follows.

In one case, a license was granted, but the file did not include the required notification from NSIR regarding international safeguards and physical security requirements. Although an NSIR log

indicated that a response was sent prior to the issuance of the license, documentation could not be provided. In another case, the required notification from NSIR concerning international safeguards and physical security requirements was dated four days after the license was issued. In this circumstance, there was a note on an e-mail saying, "Verbal OK from NSIR. Memo is to come." The note is not dated and fails to indicate who provided the approval.

Security Vulnerabilities

Import/export licensing helps to combat the inappropriate spread of specified nuclear materials. Exceptions in the processing of import/export license applications could expose the public to potentially harmful consequences. The four exceptions noted above include:

- Two license applications for the export of uranium hexafluoride, which if released into the atmosphere, can form a highly toxic chemical compound; and
- Two license applications for the export of Uranium-235, which, with extensive enrichment, can be used to produce nuclear weapons.

Improper processing of import/export license applications could lead to security vulnerabilities regarding control of nuclear materials.

Quality Control Weaknesses

The lack of written quality control procedures results in compliance exceptions. Written procedures, including the proper use of a checklist, would help ensure compliance with all applicable requirements. The license application files contain a tracking list that could easily be modified into a quality control checklist. The checklist should contain steps to achieve compliance with all applicable requirements for the processing of import/export license applications and provide evidence of supervisory review and approval.

The significant increase anticipated in the number of license applications heightens the importance of quality controls.

RECOMMENDATION

The OIG recommends that the Director of the Office of International Programs:

2. Develop and implement written quality control procedures to include the use of a checklist.

IV. CONSOLIDATED LIST OF RECOMMENDATIONS

The OIG recommends that the Director of the Office of International Programs:

1. Develop and implement a written methodology for the annual calculation of import/export license application fees that provides for correlation between time codes and fee categories and results in the development of fair and equitable license application fees that recover the agency's full cost of processing the applications.
2. Develop and implement written quality control procedures to include the use of a checklist.

SCOPE AND METHODOLOGY

This audit reviewed NRC's import/export licensing application process to determine whether OIP was (1) properly reviewing and approving import/export authorizations in a timely manner, (2) effectively coordinating this activity with other Federal agencies, and (3) efficiently and effectively coordinating import/export authorizations internally.

To accomplish the audit objectives, the OIG reviewed and analyzed pertinent laws and regulations. In addition, OIG identified and analyzed OIP guidance. OIG conducted interviews with selected NRC officials to gain an understanding of the agency's processing of import/export license applications as well as practices employed in license fee development. Interviews were conducted to determine current issues, problems, known deficiencies and to assess management controls. OIG interviewed personnel in the Offices of International Programs, Chief Financial Officer, General Counsel, Nuclear Material Safety and Safeguards, and Nuclear Security and Incident Response. OIG also met with representatives from the Department of State and Department of Energy.

OIG conducted compliance tests of NRC's processing of FY 2003 import/export license applications. OIG also analyzed the license fee development process. OIG reviewed and analyzed management controls related to the audit objectives.

This work was conducted from February through May 2004, in accordance with Generally Accepted Auditing Standards. Steven Zane, Team Leader, Steven Shea and Susan Jones, Senior Auditors and Amanda Hollander, Intern conducted the work.

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IMPORT/EXPORT LICENSE FEE CATEGORIES AND ASSOCIATED FEES

Nuclear Regulatory Commission

\$ 170.31

SCHEDULE OF MATERIALS FEES—Continued

[See footnotes at end of table]

Category of materials licenses and type of fees	Fee
15. Import and Export licenses:	
Licenses issued under part 110 of this chapter for the import and export only of special nuclear material, source material, tritium and other byproduct material, heavy water, or nuclear grade graphite.	
A. Application for export or import of high enriched uranium and other materials, including radioactive waste, which must be reviewed by the Commissioners and the Executive Branch, for example, those actions under 10 CFR 110.40(b). This category includes application for import of radioactive waste.	
Application—new license	\$10,300.
Amendment	\$10,300.
B. Application for export or import of special nuclear material, source material, tritium and other byproduct material, heavy water, or nuclear grade graphite, including radioactive waste, requiring Executive Branch review but not Commissioner review. This category includes application for the export of radioactive waste.	
Application—new license	\$6,000.
Amendment	\$6,000.
C. Application for export of routine reloads of low enriched uranium reactor fuel and exports of source material requiring only foreign government assurances under the Atomic Energy Act.	
Application—new license	\$1,900.
Amendment	\$1,900.
D. Application for export or import of other materials, including radioactive waste, not requiring Commissioner review, Executive Branch review, or foreign government assurances under the Atomic Energy Act. This category includes application for export or import of radioactive waste where the NRC has previously authorized the export or import of the same form of waste to or from the same or similar parties, requiring only confirmation from the receiving facility and licensing authorities that the shipments may proceed according to previously agreed understandings and procedures.	
Application—new license	\$1,300.
Amendment	\$1,300.
E. Minor amendment of any export or import license to extend the expiration date, change domestic information, or make other revisions which do not require in-depth analysis, review, or consultations with other agencies or foreign governments.	
Amendment	\$240.

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**OFFICE OF INTERNATIONAL PROGRAMS' TIME AND LABOR
CODES**

I00015	Import/Export Licensing & Consultations – General
I00016	Import/Export Licensing & Consultations – Import Waste (IW)
I00017	Import/Export Licensing & Consultations – Byproduct Material (XB)
I00018	Import/Export Licensing & Consultations – Components (XCOM)
I00019	Import/Export Licensing & Consultations – Heavy Water (Deuterium), or Nuclear Grade Graphite
I00020	Import/Export Licensing & Consultations – Reactor (XR)
I00021	Import/Export Licensing & Consultations – Special Nuclear Material (XSNM)
I00022	Import/Export Licensing & Consultations – Source (XSOU)
I00023	Import/Export Licensing & Consultations – Export Waste (XW)
I00024	Import/Export Licensing & Consultations – Part 810 Technology Retransfers
I00025	Import/Export Licensing & Consultations – Rulemaking