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Union Carbide Corporation
Sterling Forest Research Center
ATTN: Mr. James J. McGovern, Manager
Radiochemical Production
P.O. Box 324
Tuxedo, New York 10987

Gentlemen:

We have reviewed the revised fundamental nuclear material control plan dated July 1, 1975, for the Union Carbide Sterling Forest Laboratory which was submitted in response to the requirement of 10 CFR 70.58(1).

In order to ensure complete compliance with the requirements of 10 CFR 70.58, we propose to add to your license the new conditions listed in Enclosure 1. We are writing you before the requirements are officially formalized in order to afford opportunity for your comment. An alternative to a proposed condition will be considered if it provides equivalent or improved control for special nuclear material within the intent of the condition. Justification should be provided for all changes. We believe it would be to our mutual interest if your response were prepared in a line-in/line-out approach, suitable for final issuance. Proposed changes to conditions should be prepared in a manner acceptable for public disclosure.

Please forward your comments within twenty (20) days of the date of this letter. In the absence of any comments, action will be taken to modify your license in accordance with the proposed conditions.

We have established that your revised plan dated July 1, 1975, contains information of a type specified in 10 CFR 2.790(d). Accordingly, pursuant to Section 2.790(d), the enclosure is deemed to be commercial or financial information within the meaning of 10 CFR 9.5(a)(4), and shall be subject to disclosure only in accordance with the provisions of 10 CFR 9.12.

Sincerely,

/s/

R A. Brightsen, Assistant Director
for Licensing
Division of Safeguards

Enclosure:
1. Proposed New Conditions

OFFICE			MCL/SG	MCL/SG	ADL/SG	
SURNAME			LWFields/rpc	LWirfs	RBrightsen	
DATE			1/6/76	1/8/76	1-9-76	

Form AEC-318 (Rev. 9-53) AECM 0240 ☆ U. S. GOVERNMENT PRINTING OFFICE: 1974-526-166

Enclosure

Proposed New Conditions for the Safeguards Amendment
(SNM-639)

FACILITY ORGANIZATION

A. The Manager of Health Physics shall have the responsibility for the overall planning, coordination, and administration of the material control functions for special nuclear material (SNM).

B. Records on training or briefing session attendance and other training data shall be maintained and retained for a minimum of two years by the Manager of Health Physics.

FACILITY OPERATION

C. The licensee shall follow the fundamental nuclear material control plan dated July 1, 1975, with the exception of the last three sentences in section 7.3.4, and as revised in accordance with the provisions of 10 CFR 70.32(c).

D. No statement in the licensee's Plan identified in Condition C shall relieve the licensee of a requirement of 10 CFR 70 unless granted in a specific exemption or exception set forth as a condition of this license.

E. Operations involving special nuclear materials which are not described in the Plan identified in Condition C shall not be initiated until an appropriate safeguards plan has been approved by the Nuclear Regulatory Commission.

F. All SNM not in transit shall be physically within an MBA or an ICA.

G. The custody of all special nuclear material within each MBA and ICA shall be the responsibility of a single designated individual. Each MBA shall have a different custodian and no individual shall be the custodian of an MBA and an ICA.

H. MEASUREMENTS

All internal transfers of uranium from MBAs shall be based on measurements for element and isotope, except as specified in Condition 3.1.1.

MEASUREMENT CONTROL

I. The SNM Measurement Procedures Manual shall be approved and be in use, effective with the implementation of the Plan identified in Condition C.

RECORDS AND REPORTS

J. The licensee shall use his or his designated agent's measured values for SNM accounting, except as specified in Condition 3.1.1.

K. All accounting records, including measurement source data documents and internal transfer records, shall be included in the accounting records retained for five years.

INTERNAL CONTROL

L. The same individual shall not sign a document as both the Shipper and Receiver.

M. Continuous inventory records shall be established and maintained to provide current knowledge of the identity, location, and quantity of all SNM contained within the plant in discrete items and containers.

MANAGEMENT

N. Any apparent loss of a discrete item or container of special nuclear material which cannot be resolved by an immediate investigation shall be reported to the Manager of Health Physics, who shall promptly notify the Regional Office of the Nuclear Regulatory Commission, and shall conduct an investigation of the loss. The Manager of Health Physics shall document the results of his investigation and maintain the record for five years.

O. Deficiencies noted during an audit shall be investigated immediately and a summary report on the corrective action taken, including the date when action was completed, shall be appended to the audit report.