

JAN 25 1980

Docket
File
396-88

Addressees:

- B&W-Lynchburg-70-364
- B&W-Naval-70-27
- B&W-Apollo-70-135
- B&W-Commercial-70-1201
- CE-Hematite-70-36
- CE-Windsor-70-1100
- Exxon-70-1257
- General Atomic-70-734
- GE-Val-70-754
- GE-Wilmington-70-1113
- NFS-Erwin-70-143
- Rockwell-70-25
- Texas Inst.-70-33
- Union Carbide-70-687N
- UNC-Uncasville-70-371
- Westinghouse-70-1143-70-1151

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Gentlemen:

The regulations in 10 CFR 70.51(e)(4)(ii) specify that, within 30 calendar days after the start of each ending physical inventory required by paragraph (c)(3), a licensee must reconcile and adjust the book record of quantity of element and fissile isotope, as appropriate, to the results of the physical inventory. However, the term "book record" is not explicitly defined. Therefore, the purpose of this letter is to document our position that "book record", as used in this context, means both the total plant and individual MBA/ICA records.

If not already included, a statement to this effect should be incorporated in the appropriate sections of Chapters 5.0 and 6.0 of the Fundamental Nuclear Material Control Plan. The change should be submitted under the provisions of 10 CFR 70.32(c) for changes which do not decrease the effectiveness of the material control and accounting program.

Should you have any questions or comments on our position on this subject, please contact us.

Sincerely,

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James G. Partlow, Chief
Material Control and Accountability
Licensing Branch

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