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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 26 1979

GML:HB
70-1257

Exxon Nuclear Company, Inc.
Research and Technology Center
ATTN: Dr. R. Nilson, Manager
Licensing
2955 George Washington Way
Richland, Washington 99352

Gentlemen:

Reference is made to the letter from H. Paul Estey, Manager, Licensing and Compliance, Richland Facilities to Mr. William T. Crow, NRC, dated June 22, 1979.

In his letter Mr. Estey writes of proposed modifications and expansions of the Richland facility. In his summary pages (enclosed) he notes that no additional information will be submitted. If this statement is taken in the literal sense, we would have to take exception since certain parts of 10 CFR 70 would require revised sections to the Fundamental Nuclear Material Control Plan. Among these requirements are the following:

1. 10 CFR 70.51(e)(5) - LEID model
2. 10 CFR 70.51(f)(1) through (4) - inventory procedures
3. 10 CFR 70.57(b) - measurement control plan
4. 10 CFR 70.57(b)(4) - process and engineering tests for sampling
5. 10 CFR 70.57(b)(6) - engineering analysis and evaluations of design, installation, preoperational tests, calibration, and operation of each measurement system.

This list is not complete and is only given for an example of the additional data that may be required.

We request that you review the above items and others found in 10 CFR 70 to provide assurance that if they apply to your proposed operation that they will be addressed by providing revised pages to your FNMC Plan for NRC review and approval prior to beginning operations.

Sincerely,

James G. Partlow, Chief
Material Control & Accountability
Licensing Branch
Division of Safeguards

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