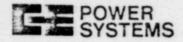
NIS/79/607



February 16, 1979

U.S. Nuclear Regulatory Commission Willste Building, Room 616 7915 Eastern Avenue Silver Springs, Maryland 20910

Attention: James G. Partlow, Chief

Material Control Licensing Branch

Division of Safeguards

Subject: Measurement Control Program

References: 1. C.E. Letter 5/17/78, NIS/78/523

2. NRC Letter 9/11/78 SGMC:HB

3. Meetings in your office October 17 and 18 and December 5,

6, 1978

4. 10CFR70.57

## Gentlemen:

Pursuant to your request for a more detailed measurement control program description, the Measurement Control Program has been revised consistent with comments received in your letter of September 11, 1978 and subsequent meetings with you and your staff in October and December, 1978. Copies of Chapter 4.0 Measurement Control Program dated February, 1979 are enclosed. This is intended to be included as Chapter 4.0 of the Fundamental Nuclear Materials Control manual.

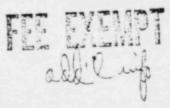
Note that revised pages 1-2 through 1-9 of Chapter 1 of the Fundamental Nuclear Materials Program submitted via our letter of May 17, 1978 (Reference 1) remain valid as submitted then, and hence have not been included with this submittal.

Also, enclosed are revised process flow diagrams. These are updated to reflect current operation. They do not represent any change to previously approved operations. Please insert these in the Appendix in place of pages A-8 thru A-11 dated January, 1977.

Our investigation of the problem of "Traceability" of uranium assay standards has not been completed. Efforts are continuing on this but have been delayed by our recent inventory and current production activity. It is expected that our review of this problem will be completed by March 16, 1979.

The document, as submitted, assumes that our investigation of "Traceability" of the uranium standards will conclude that such standards are traceable to the

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accepted National Measurement System. If this is not verified by our current investigation, we will revise the document as necessary. We believe this to be consistent with discussions with your staff.

Your letter of September 11, 1978 (Reference 2) stated that our submittal of May 17, 1978 did not address the requirements of 10CFR70.57 or the draft of the NRC staff review criteria. We disagree with that statement. The May, 1978 submittal did in fact address each point of 10CFR70.57 and the review criteria and in fact used the same sections and subsections as used in the NRC review criteria. The degree of detail required continues to be a problem in such submittals.

Very truly yours,

COMBUSTION ENGINEERING, INC.

H. E. Eskridge

Supervisor, Nuclear Licensing,

Safety and Accountability

Z. E. Eskilye

/wg Enclosure

DOCKET NO. 70-36

DATE: 2-27-79

## NOTICE TO MRC PUBLIC DOCUMENT ROOM

The following item(s) are being withheld from public disclosure pursuant to the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974.

Attachment to 2-16-79 L+R