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May 13, 1980



Mr. Jorge McCorkle  
Chief, Physical Security Licensing Branch  
Division of Safeguard  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

Dear Mr. McCorkle:

Enclosed is our plan to implement Safeguard Requirements for  
Special Nuclear Material of Moderate and Low Strategic Signi-  
ficance under 10 CFR Part 73.

Your attention on this matter would be appreciated.

Sincerely your,

T. Saiki  
Assistant to General Manager  
Metal Second Department

TS/hi  
Enclosure

8006120179 C

# MITSUI & CO. (U.S.A.), INC.

IMPORTERS AND EXPORTERS

200 PARK AVENUE

NEW YORK, N. Y. 10017

COMMUNICATIONS  
TELEPHONE  
RVA 2-1234  
RTT TELETYPE  
WVA TELETYPE

This report is prepared to prove that MITSUI & CO., (U.S.A.), INC, as a licensee to export special nuclear material of low strategic significance to Japan, has a well established system for the physical protection of the material in accordance with the code of Federal Regulation Part 10, Part 73, and Part II of Standard Format and Content for a Licensee Physical Security Plan for the Protection of Special Nuclear Material of Moderate or Low Strategic Significance.

As a licensee, Mitsui receives the enriched U<sup>235</sup> for commercial nuclear reactors in Japan at F.O.B. DOE plant.

Mitsui uses Tri-State Motor Transit Co. for the U.S. inland truckage and some Japanese shipping companies like Mitsui OSK Lines, LTD., for the ocean transportation from the United States to Japan.

Every arrangement and communication with and between parties concerned is done through Mitsui via telephone, telex and facsimile.

In a word, Mitsui is an arranger of the export and transportation of the material for Japanese consignees on their behalf.

## PART II SNM OF LOW STRATEGIC SIGNIFICANCE

Chapter 1 through Chapter 4:

These do not apply to Mitsui which does not possess or use more than 10 Kg of SNM of low strategic significance.

Chapter 5 MATERIAL TRANSPORTATION REQUIREMENTS (73.47 (g) (1)

### 5.1 Advance Notification (73.47 (g) (1(i) )

Mitsui ensures that, prior to each shipment of material, the receiver will be notified of the impending shipment and provided the following types of information by using Mitsui Global Network to Mitsui Tokyo and by Japanese domestic telex, telephone and facsimile from Mitsui Tokyo to the receiver:

1. Mode of transport (truck and ocean going vessel)
  2. Estimated time of arrival at Japan (including time of arrival at the port of export in the U.S. and time of departure at the port)
  3. Location where material is to be transferred to the receiver in Japan (this is notified to the receiver by Mitsui Tokyo)
  4. Name of carrier (trucker and shipping company)
  5. Transport identification (ship's name)
- 5.2 Receiver Confirmation (73.47(g)(1)(ii))

Mitsui will use the following procedures to ensure that shipment of material does not take place until the receiver acknowledges the planned shipment and mode of transport and states that he will be ready to accept the shipment at the planned time and location.

1. First of all, the receiver in Japan decides the time the shipment is required at their plant in Japan, and informs it to Mitsui Tokyo.
2. Mitsui Tokyo investigates the suitable ocean going vessel to meet with the receiver's requirements and negotiates space of the vessel with shipping company.
3. Mitsui Tokyo, upon completion of arrangement for the space, instructs Mitsui (U.S.A) to make necessary procedures to export the shipment on the arranged vessel.
4. Mitsui (U.S.A.) makes the time schedule and advises it to DOE plant, the inland carrier and shipping company well in advance, and instructs them to deliver the shipment when all necessary pre-arrangements are made.
5. Without this instruction of Mitsui (U.S.A.) based on the original instruction of the receiver in Japan, DOE plant never deliver the shipment to the inland carrier.

5.3 Container (73.47(g)(1)(iii))

Mitsui will transport the material in a tamper-indicating sealed container in the following way.

1. After the 30 B (A) type of cylinders are filled with the material by DOE, Ledoux inspectors will apply their seal to each cylinder in the following way:

The sealing technique for the 30A or 30B cylinder uses a gathered plastic bag. Fill out a tag and attach it to the cylinder valve. Tighten the sealing wire and attach seal. Attach a seal to the transfer cylinder plug. Record the serial number for the specific 30A or 30B cylinder. Record the proper number and that the seal number and cylinder numbers are documented on the inspection data sheet.

2. The cylinder containing the material is packed into the specially designed protective overpacks (PSP) by hand of DOE prior to shipment.
3. This protective overpack is carefully sealed by DOE prior to shipment.

Both seal numbers of cylinder and PSP are informed to Mitsui by Ledoux and DOE. Mitsui will inform the receiver the number of seal.

Then, the receiver can detect any tampering with the material's container that may have occurred during shipment.

#### 5.4 Inspection (73.47(g)(1)(iv))

Mitsui inspects, by using Ledoux & Co. Ltd, which provides inspection of containers in accordance with the procedure as stated in ORO-691, the integrity of the material containers seals just prior to shipment, as well as the integrity of the material containers themselves. The result of the inspection is reported in the formal report from Ledoux.

#### 5.5 In-transit physical protection (73.47(g)(1)(v))

Mitsui arranges for the in-transit physical protection of the material in accordance with the requirements of section 73.47 (g)(3) of this part as described in chapter 7.

#### Chapter 6 Receiver requirements (73.47(g)(2))

This chapter is not applied to Mitsui who does not receive the shipment.

#### Chapter 7 In-transit physical protection requirements

##### 7.1 Response procedure (73.47(g)(3)(i))

1 In the event Tri-State Motor Transit Co. (TSMT) receives directly or otherwise learns of, a threat of theft, advise DOE and Mitsui of all details pertaining to threat. Options available at the time, i.e. cancelation of move, diversion of shipment in route, request for police escort, shall be jointly considered and a course of action selected.

2 In the event TSMT learns that theft has actually occurred advise DOE and Mitsui, local law enforcement authority in area where theft is believed to have occurred.

3. The appropriate Nuclear Regulatory Commission inspection and enforcement regional office is notified immediately in the event of above 1, and 2.

## 7.2 Notification (73.47(g)(3)(ii))

Shipping company or its agent at the port of export shall notify Mitsui of the arrival of the shipment or of any such shipment that is lost or unaccounted for after the estimated time of arrival. In the event the shipment becomes over due,

1. Mitsui shall make inland carrier investigate the cargo location.
2. The inland carrier shall provide Mitsui all available information relative to the last contact (check call) time and location of shipment.
3. When necessary, Mitsui requests the assistance of local law enforcement authority in searching for shipment in the areas between the last known location of vehicle and its assigned destination.

## 7.3 Lost material notification (73.47(g)(3)(iii))

When Mitsui and inland carrier can not find reasonable explanation regarding its status, Mitsui shall notify NRC regional office that the material is missing along with the details and results of the trace investigation or what actions are being taken to trace.

Mitsui shall file within a period of 15 days a written report to the appropriate NRC regional office setting forth the details and result of the tracing investigation. A copy of such written report shall be sent to the director, office of inspection and enforcement, U.S. NRC.

## Chapter 8 Export requirements

Mitsui inland transportation of the material are made for export purposes to Japan. Therefore, procedures described above chapter 5 and 7 are all applied to this chapter. In case of the marine casualty during the voyage, the captain of the vessel shall inform of it to the office of shipping company in U.S.A., who notifies the same to the U.S. coast guard and Mitsui. NRC regional office is notified immediately in the event of the above through Mitsui.



FINAL CONSIGNEE

.The Tokyo Electric Power Company  
1-3, 1-chome, Uchisaiwai-cho,  
Chiyoda-ku, Tokyo, Japan

.The Chubu Electric Power Company  
No. 1, Toshi-cho, Higashi-ku,  
Nagoya, Aichi Pref., Japan

CONSIGNEE

. MITSUI & CO., LTD Head Office  
2-1, 1-chome, Otemachi,  
Chiyoda-ku, Tokyo, Japan

Nuclear Fuel Div./Imports Traffic Div.  
TEL : 03-265-1111  
TLX : 322253(MITSUI J 22253)

SHIPPER

M E C

Regional  
Office

. MITSUI & CO. (U.S.A.), INC. Head Office  
200 Park Avenue, New York, N.Y. 10166

Metal 2ND Dept./Traffic Dept  
TEL : 212/973-2011, 7093  
TLX : 12072 (MITSUI NYK)

D.O.E. PLANT

.GOODYEAR ATOMIC CORP.  
P.O.Box 628,  
Pileton, Ohio 45661

Production Control  
TEL : 614/289-2331  
TWX : 810-258-2676

.UNION CARBIDE CORP.  
P.O.Box P,  
Oak Ridge, Tenn. 37830

Nuclear Division  
TEL : 615/574-8331  
TWX : 810-571-1006

INLAND CARRIER

TRI-STATE MOTOR TRANSIT CO.  
P.O.Box 113,  
Joplin, Missouri 64801

Operation  
TEL : 800-641-7580  
TWX : 910-774-4518

SHIPPING COMPANIES

.MITSUI O.S.K. LINES  
TEL : 212/466-4829  
TWX : 212-571-0557

.NIPPON YUSEN KAISHA  
(N.Y.K. LINE)  
TEL : 212/466-3824  
TWX : 710-581-3614

.Y.S. LINE  
TEL : 212/466-0293  
TWX : 710-581-3472

.JAPAN LINE  
TEL : 212/466-3914  
TWX : 710-581-5025

## TRANSPORTATION OF UO2 POWDER

All the services Mitsui should provide are the same as that for the transportation of UFS except the following:

As a licensee, Mitsui receive from General Electric Co. UO2 powder for commercial reactors in Japan at FAS Port of Export.

At Mitsui's request, Japanese shipping companies take care of all the necessary arrangements, administration, etc., for the completion of the transportation of UO2 powder from FAS Port of Export to Japan.

### Chapter 5

#### 5.3 Container (73.47(a)(1)(iii))

General Electric Co., who converts the UFS to UO2, provides the necessary containers for the transportation of UO2 powder.

#### 5.4 Inspection (73.47(a)(1)(iv))

Japanese shipping companies will perform cargo surveys to determine vaning condition, condition of packing, etc, at CFS Port of Export upon arrival of cargo.

FINAN CONSIGNEE

The Tokyo Electric Power Co.  
 1-3, 1-Chome, Uchisaiwai-cho, Chiyoda-ku  
 Tokyo, Japan  
 The Chubu Electric Power Co. No-1,  
 Tokhin-cho, Higashi-ku, Nagoya, Aichi-ken, Japan

CONSIGNEE

Mitsui & Co., LTD Head Office  
 2-1, 1-chome, Otemachi, Chiyoda-ku,  
 Tokyo, Japan  
 Nuclear Fuel Div/Import Traffic Div.  
 Tel: 03-235-1111  
 TLX: J22253 (Mitsui N 22253)

Shipper

Mitsui & Co. (U.S.A.), Inc. Head Office  
 200 Park Avenue, New York, N.Y. 10156

Shipping Manager

Mitsui & Co. (U.S.A.), Inc. San Francisco Office  
 one California Street, Suite 3000  
 San Francisco, Calif. 94111  
 Tel: 415-981-2277 Ex 55, 56  
 TLX: 340966 (Mitsui A SFO)

INLAND CARRIER

General Electric  
 105 Custner Ave,  
 San Jose, Ca, 95125  
 International Requisition  
 Contract Fuel Project Dept  
 Tel: 408-925-1217  
 TLX: 357443 (QE NEA SNJ)  
 International Traffic  
 Tel: 408-925-2100  
 TLX: 357443 (Genedsnj)

Universal Transcontinental Corp.  
 450 Mission St. Suite 300  
 San Francisco, Ca, 94105  
 Tel: 415-543-3471  
 TLX: 34-0274

Shipping Companies

Mitsui O.S.K. Line  
 Tel: 415-982-8350  
 TLX: 34463 (WMS Dimond SFO)

NYK Line  
 Tel: 415-957-4705  
 TLX: 33-0431 (Matage SFO)

Shawa Line  
 Tel: 415-434-0120  
 TLX: 3-4799 (Norlil SFO)

Y.S. Line  
 Tel: 415-781-3600  
 TLX: 340566 (Lilly SFO)

Japan. Line  
 Tel: 415-781-5226  
 TLX: 340463 (JL USA)



The Tokyo Electric Power Co.  
 1-3, 1-chome, Uchikawai-cho, Chiyodaku,  
 Tokyo, Japan  
 Japan Atomic Power Company  
 Otomachi Bldg., 5-1, 1-chome  
 Otomachi, Chiyoda-ku  
 Tokyo, Japan

Consignee

Mitsui & Co. LTD Head Office  
 2-1, 1-chome, Otomachi Chiyoda-ku  
 Tokyo, Japan  
 Nuclear Fuel Div/Import Traffic Div  
 Tel: 03-295-111  
 TLX: J22253 (Mitsui J22253)

SEA

Regional Office.

Shipping Arrangements

Mitsui & Co. (U.S.A.) Inc, San Francisco Office  
 one California Street, Suite 3000  
 San Francisco, Calif., 94111  
 Tel: 415-981-2277 Ex 53 56  
 TLX: 340983 (Mitsui & SFO)

Shipper

INLAND CARRIER

Shipping Companies

General Electric  
 105 Curtner Ave,  
 San Jose, Ca, 95128

International Requisition  
 Contract Fuel Project Dept.  
 Tel: 408-925-1217  
 TLX: 857448 (Genedsnj)  
 International Traffic  
 Tel: 408-825-2100  
 TLX: 357448  
 (Genedsnj)

Universal Transcontinental Corp  
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 TLX: 340468 (JL USA)