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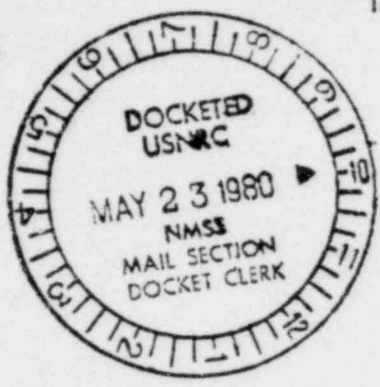


MITSUI & CO. (U.S.A.), INC.
IMPORTERS AND EXPORTERS
200 PARK AVENUE
NEW YORK, N. Y. 10017

REGULATORY OPERATIONS
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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 Significance under 10 CFR Part 73.

Your attention on this matter would be appreciated.

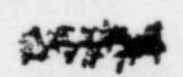
Sincerely your,

T. Saiki
Assistant to General Manager
Metal Second Department

TS/hi
Enclosure

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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 UF6 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: