SGDB:CEG 70-371

JAN 3 1 1990

NRC FILE Center

CGaskin ESuarez C Mochanald

UNC Naval Products
Division of UNC Resources, Inc.
ATTN: Mr. Richard J. Gigliotti
Corporate Security Director
67 Sandy Desert Road

Uncasville, Connecticut 06382-0981

Doc file 70-371 Case file RBurnett GBidinger, IMSB SG Amendment file

SGDB r/f DWeiss RCastaneira

Dear Mr. Gigliotti:

This is in response to your letters of June 12, November 1, and December 15, 1989 which forwarded Revisions 9A, 9B, and 9C, respectively, to your UNC Physical Safeguards Plan pursuant to the 10 CFR 73.46 Comparability Upgrade requirements of November 10, 1988.

- 1 -

We have reviewed your proposed physical security plan submittals. Except for the issues discussed in Enclosure Number 1, regarding the searching of packages and the documentation of your tactical exercise program, we find your submittals acceptable in meeting the provisions of Section 73.46. Accordingly, we are hereby revising and reissuing the physical security portion of the Safeguards Amendment, designated as SG-2, to your License SNM-368, as reflected in Enclosure 2, effective upon receipt of this letter. The unresolved issues (Enclosure 1) will be addressed in future correspondence.

Please note that the current license conditions 9.2, 9.3, 9.4, 9.4a, 9.5, 9.6, and 9.7 are no longer effective and are hereby withdrawn. In addition, the unnumbered license condition issued by our letter of December 23, 1986 is hereby redesignated as license condition 9.2, effective immediately. Enclosure 2 constitutes the entire license amendment for special nuclear materials Section 9.0 entitled "Physical Protection Requirements For Strategic Special Nuclear Material."

During our review of your Comparability Upgrade Proposal, we determined that your currently approved physical security plan does not fully satisfy the requirements of 10 CFR 73.46 in areas not related to the comparability upgrade. These items, which were identified in our letter of September 11, 1989, will be the subject of forthcoming licensing actions.

In a separate matter it is requested you notify Region I at least two weeks prior to conducting each Tactical Response Team and guard exercise.

Sincerely,

9002140244 900131 PDR ADOCK 07000371 D. J. Kasun, Acting Chief Domestic Safeguards and Regional Oversight Branch Division of Safeguards and Transportation, NMSS

Enclosures: Legion comment included As stated Legion comment included

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Docket No. 70-371 Licens No. SNM-368 Asendeent 96-2

### UNC Comparability Open Items

- 1). Identify, verify, and search all packages entering the protected area in accordance with 10 CFR 73.46(d)(6) for explosives and contraband using visual, x-ray and/or explosive detectors.
- Search all packages prior to entering a material access area for fireards, explosives, and incendiary devices in accordance with 10 CFR 73.46(d)(9).
- Provide detailed documentation incorporating planning, scenarios, evaluation, and critiques of drills and exercises using NRC guidance documents or equivalent. (Within 60 days)

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Sincerely,

D. J. Kasun, Acting Chief Domestic Safeguards and Regional Oversight Branch Division of Safeguards and Transportation, NMSS

Docket No. 70-371 Licens No. SNM-36B Amendment 86-2

### UNC Comparability Open Items

- Identify, verify, and search all packages entering the protected area in accordance with 10 CFR 73.46(d)(6) for explosives and contraband using visual, x-ray and/or explosive detectors.
- Search all packages prior to entering a material access area for firearms, explosives, and incendiary devices in accordance with 10 CFR 73.46(d)(9).
- Provide detailed documentation incorporating planning, scenarios, evaluation, and critiques of drills and exercises using NRC guidance documents or equivalent. (Nithin 60 days)

Docket No. 70-371 License Ma SNM-368 Amendment 56-2

- 9.0 Physical Protection Requirements For Strategic Special Nuclear Material (See attachment for a listing of approved revisions)
  - The licensee shall follow the physical protection plan entitled 9.1.A "UNC-Naval Products Physical Protection Plan, Revisions 9A, 9B, and 9C." dated June 12. November 1, and December 15, 1989, respectively, and as further revised in accordance with 10 CFR 70.32(e).
  - The licensee shall follow the safequards contingency plan titled 9.1.B "UNC-NPD Safeguards Contingency Plan (Rev.O)," dated September 19, 1978, as revised by Revision 1, dated May 15, 1979; and as further revised in accordance with the provisions of 10 CFR 70.32(q).
  - The licensee thall follow the guard training and qualification 9.1.0 plan titled "UNC-NPD Training and Qualification Plan Revision 4", dated September 14, 1989; and as further revised in accordance with the provisions of 10 CFR Part 70.32(e).
  - Notwithstanding that portion of 10 CFR 11.11(b)(1)(ii) which 9.2 specifies that applications be submitted to and pending before the NRC, the licensee may allow individuals to work at jobs within the criteria of paragraph 11.11(a)(1), provided such individuals are currently in possession of the NRC-L or R access authorization or an equivalent current security clearance granted by another Federal agency but not yet in receipt of the NRC-U SNM access authorization; and provided that each of them has a complete application for a COE O access authorization which has been submitted to and is pending through the U. S. Department of Energy.

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### SECTION 9.0

List of approved revisions

## UNC Physical Security Plan

Revision 9A reissue dated June 12. 1989.

Revision 9B dated November 1, 1989.

Revision 90 dated December 15, 1989.

## UNC-NPD Safeguards Contingency Plan

Revision 0 dated September 19, 1978.

Revision 1 dated May 15, 1979.

# UNC-NPD Training and Qualification Plan

Revision 4 dated September 14, 1989.