



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

DCS/DF02

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MAR 6 1990

Ms. Erna M. Utz
Siemens Corporation
1455 Pennsylvania Avenue, N.W.
Suite 300
Washington, D.C. 20004

Dear Ms. Utz:

This is in response to your fax of February 7, 1990 regarding U.S. export regulations.

With regard to your question concerning the cladding tubes delivered under an NRC general license, these are not to be included in the calculations of the "parts and components" regulations in accordance with §776.12 of the Commerce Department's export licensing regulations. Additionally, the tubes which are exported from the U.S. to West Germany under the general license can be re-exported to any other country listed in 10 CFR 110.26 without further U.S. Government permission.

Your questions regarding the Department of Commerce's general licenses should be addressed directly to them. I suggest you write to Mr. Jeff Tripp, Bureau of Export Administration, Office of Technology and Policy Analysis, BXA/OTPA/TAD/CG, Room 4056, Washington, D.C. 20230.

As requested, we are attaching a copy of the NRC Export and Import Rules and Regulations contained in 10 CFR 110. A copy of Department of Energy's 10 CFR 810, regulations covering nuclear technology exports, is also enclosed.

If we can assist you further, please call me on (301) 492-0724 or Betty Wright, Licensing Officer, on (301) 492-0343.

Sincerely,

Marvin R. Peterson, Assistant Director
for International Security
Office of Governmental and Public Affairs

Enclosure:
As stated above

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PDR XPORT
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