

## NUCLEAR REACTOR LABORATORY

## MASSACHUSETTS INSTITUTE OF TECHNOLOGY



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L. CLARK, JR. Director of Reactor Operations

March 30, 1982

Mr. James R. Miller, Chief Standardization and Special Projects Branch Division of Licensing Nuclear Regulatory Commission Washington, D.C. 20555



Subject: Delay in Implementation Date for Physical Security Plan,

License No. R-37, Docket 50-20

Dear Mr. Miller:

Massachusetts Institute of Technology acknowledges receipt of your letter of March 11, 1982 forwarding Amendment No. 19 to Facility Operating License No. R-37 and requests a delay in the implementation date for the Physical Security Plan revision covered by that amendment.

The reason for requesting the delay arises from the fact that a concurrent amendment to Technical Specification 3.10 of License No. R-37 is necessary in order for MIT to implement the security plan changes. Please refer to our letters of August 28, 1980 and May 14, 1981.

It is requested that the implementation date for the Physical Security Plan revisions be delayed until 90 days after approval of the amendment to Technical Specification 3.10.

In your March 11, 1982 letter, it was stated that MIT must submit a transportation Physical Security Plan prior to anticipated shipments or receipts pursuant to 10 CFR 73.67(e) and (g). We stipulated in the plan, Sections 13.B.7.1 and 7.2, that MIT would submit a revision to the plan 120 days in advance in accordance with 10 CFR 73.67(e)(1) and (e)(1)(v) prior to shipping SNM of moderate strategic significance or before arranging for the in-transit physical protection of such material being shipped to MIT. We believe that the receipt of SNM of moderate strategic significance and the transportation of SNM of low strategic significance was suitably addressed in Sections 7.3-7.6 of the plan and that no future submissions should be necessary in regard to those activities. Please contact me if further clarification in this regard should be required.

Sincerely,

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cc: MITRSC USNRC-DMB

Lincoln Clark, Jr.

Director of Reactor Operations

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