UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON D C 20555

CHAIRMAN

April 16, 198[illegible]

Dr. John D. Randall, Chairman
Organization of Training, Research
and Test Reactors
Texas Engineering Experiment Station
Texas A&M University
College Station, Texas 77843

Dear Dr. Randall:

Thank you for your letter of February 8 pertaining to the concerns of the training, research and test reactor community about the NRC's proposed amendments to the physical security requirements for nonpower reactor licensees.

As stated in the Federal Register notice of proposed rulemaking (46 FR 64333), the intent of the proposed amendments to the regulations is to require measures to be taken by nonpower reactor licensees that would provide a level of protection for formula quantities of strategic special nuclear material (SSNM) comparable to that provided for the same material at fuel cycle facilities. In addition, the proposed amendments are intended to recognize a number of features of nonpower reactor facilities that may offer inherent protection of SSNM against theft. Our basic aim here is to achieve our safeguards objective and at the same time, insofar as practicable, allow maximum operational flexibility.

In view of your organization's concern that the proposed rule may impose your programs without commensurate safeguards benefits, I have directed the staff, in its preparation of the final rule to give specific attention to your comments.

The Executive Director for Operations has asked John Davis, the Director of the Office of Nuclear Material Safety and Safeguards (NMSS), to have the staff meet with your group and other interested persons. This likely would be in May and would afford the staff an opportunity to acquire a fuller understanding of specific concerns and comments and to discuss concrete suggestions on alternative approaches to achieve NRC's objective while allowing maximum flexibility for operators. Any new information that may arise in such a meeting would be publicly available to the extent that this information is not protected.

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The staff's proposed final rule is not scheduled to be submitted to the Commission until late 1982. I hope that further discussions with the staff are useful in developing a proposed final rule that provides adequate safeguards protection with operational flexibility. If exchanging views with the staff, your group still desires a meeting with the Commission, a public meeting could be arranged to discuss outstanding issues.

Sincerely,

Nunzio J. Palladino