ROSE.MOUNT

Measurement Control Analytical Valves

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X COM1052

December 17, 1990

Mr. Ronald D. Hauber Assistant Director for International Security, Exports and Materials Safety International Programs Office of Governmental and Public Affairs

RE: Rosemount Inc. Export License Application XCOM1044

Dear Mr. Hauber:

We were disappointed to receive your letter dated 10/15/90 that our export license application XCOM1044 had been denied. Please allow me to explain why.

Rosemount pressure transmitters are used by many process control industries to measure pressure, liquid level, or fluid flow. They are used in chemical plants, pulp and paper mills, refineries, fossil power plants, as well as nuclear power plants. Rosemount produces and sells both commercial grade and nuclear qualified models.

Our nuclear qualified models are similar in basic design and operation to our commercial grad Model 1151 because they evolved from the Model 1151. Enclosed here are copies of our product data sheets which illustrate the similarities as well as the basic differences between our Model 1151 and Model 1153 Series D nuclear qualified pressure transmitter.

The most important difference is that our nuclear qualified transmitters have been through qualification testing to assure us and our customers that they will perform their intended function even if exposed to the extreme conditions of a nuclear accident. Some of the components and materials are different, and our nuclear models are built using special manufacturing processes and quality assurance procedures to assure that the transmitters we build today are as good or better than those we originally qualified.

Please bear in mind that nuclear qualified transmitters do not make it any easier to start up or run a nuclear reactor, but since they are more likely to continue operating under accident conditions they improve the chances of being able to shut the reactor down safely under extreme environmental conditions should that need arise.

XCOM1052 Rosemount inc. Magairement Division 11004385 8200 Market Boulevard Chanhassen, MN 55317 U.S.A. Fifteen to twenty years ago only commercial grade pressure transmitters were used at nuclear power plants because nuclear qualified models were not yet available. The Chinese could operate their reactors very well using just commercial grade pressure transmitters which are available from manufacturers in China and many other countries. Therefore, if we withhold nuclear qualified transmitters from the Chinese, we just force them to run those reactors without one of the safeguards which is required by the NRC in this country. We ask that you please reconsider our new application for this export license because the nuclear qualified pressure transmitters we would like to ship to China would only contribute to the safe operation of their reactor, nothing more. If there is additional information that you need, please do not hesitate to contact me. Thank you. Regards, Melanie Martin Melanie Martin Contract Administrator 111