

# SIEMENS

December 22, 1993

U.S. Nuclear Regulatory Commission  
Attn: Mr. Richard Milstein  
Division of Fuel Cycle Safety & Safeguards  
Licensing Branch  
Washington, DC 20555

Dear Mr. Milstein:

**Ref: Uranium Solutions, Safeguards Plan Revision**

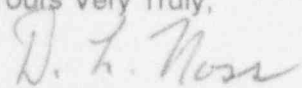
I am sorry that I missed your call this morning. Unfortunately your suggestion of rescheduling our discussions until 1:00 P.M. will not work for us, as Dick Schneider will not be here.

Dick and I discussed the Uranium Solutions question, and we were able to reconstruct the problem of sealing the UNH barrels. Revision 16 of EMF-12 had no reference to Uranium Solutions in Section 5.1, or any other section of Chapter 5. However, when Revision 17 was issued, the Uranium Solutions were inserted in the appropriate places in Chapter 5. This was done to resolve an inspection finding.

In addition, a section in Chapter 7 was added for Revision 17 which specifically declares waste barrels, waste boxes, contaminated filters in boxes and uranium solutions (<5 g/l U235) as unattractive items of which the addition or removal of SNM is not credible. These are exempt from tamper-safing and remeasurement provided the physical integrity of the item has been maintained, and that the presence of each item has been confirmed by the inventory team.

We would maintain that the previously approved section in Chapter 7 should resolve the questions you have. I have attached a copy of the section in Chapter 7 to which I am referring.

Let me know if you have any questions.

Yours Very Truly,  
  
D. L. Noss,  
Safeguards Specialist

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