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December 10, 1986

696-9092

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Name: Keith Asmussen

Title: Mgr. Licensing, Safety + Nuclear Compliance

Organization: GA Technologies Date: 12/10/86

Mr. John B. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Subject: Docket 70-734 : SNM-696; 10 CFR 70.32 Changes to Security
Plans and Fundamental Nuclear Material Control Plan
(5 copies)

- References: 1. K. E. Asmussen (GA) letter 696-9047 to William T. Crow
(NRC Headquarters) dated September 25, 1986
2. K. E. Asmussen (GA) letter 696-9090 to William T. Crow
(NRC Headquarters) dated December 10, 1986

Dear Mr. Martin:

Following the recent acquisition of GA Technologies Inc. (GA) by a privately held company owned by Messrs. Neal Blue and Linden Blue, there have been some management personnel and organizational changes. The purpose of this letter is to advise you of those changes, one of which involves our compliance functions. We are, therefore, also submitting herewith corresponding revisions to selected pages of our various plans. The pages were revised pursuant to 10 CFR 70.32.

GA has been restructured into six major components reporting directly to Mr. Neal Blue as Chairman and Chief Executive Officer. The six major components and their respective leaders are:

- . Institute for Development and Application of Advanced Technologies. Dr. Tihiro Ohkawa, Vice Chairman and Senior Vice President, will head the Institute, which will function as a generator of innovative technology initiatives and as a resource available to all company divisions in addressing the application of their respective technologies.
- . Fusion Division. Dr. David O. Overskei, Senior Vice President, will be in charge of GA activities relating to nuclear fusion.
- . Defense Division. Dr. Thomas A. Dillon, Senior Vice President, will be responsible for all GA defense-related efforts, except for the subsidiary defense production activities included within the Enterprises Division.

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- . Enterprises Division. Mr. Reau Graves, Jr., Senior Vice President, will head the Enterprises Division, which is intended to give recognition and support for GA's existing and future subsidiary business enterprises.
- . Reactor Division. Mr. Linden Blue, Vice Chairman, will direct this division, whose major thrust will be the ultimate commercialization of the Modular HTGR (MHTGR) and allied programs.
- . Administrative Division. Mr. Ed Jones, Senior Vice President, will be responsible for this division, which will include Contracts & Law, Services, and Finance.

The company will receive direction from a Board of Directors as well as advice from a Board of Advisors.

All functions responsible for assuring compliance with applicable rules, regulations and license requirements remain unchanged and are still a part of the Human Resources organization of GA. The only change relevant to the compliance function is that the director of Human Resources, who used to report to the president of GA, now reports directly to a member of GA's Board of Directors. More specifically, Mr. R. Rademacher, director of Human Resources, now reports to Mr. R. Graves as a member of the Board of Directors. Further, note that Mr. Graves is also the Senior Vice President responsible for the Enterprises Division. With Human Resources reporting directly to a member of the Board of Directors who is also a Senior Vice President, ready access to, and support from, the highest levels of GA management remains assured for the compliance functions.

Finally, in Reference 1, it was reported that Industrial Safety reports to "Licensing and Nuclear Compliance." In order to be more descriptive of all of its responsibilities, Licensing and Nuclear Compliance is now known as "Licensing, Safety and Nuclear Compliance." Accordingly, various pages of Section 3 of our license have been recently revised (Reference 2). However, inasmuch as the change is in name only, and the change is somewhat subtle, no special effort will be made to revise all of our other various plans and documents simply for the purpose of changing this name. Rather, the name will be changed when other substantive changes necessitate page revisions. In the interim, "Licensing and Nuclear Compliance" and "Licensing, Safety and Nuclear Compliance" may be used to refer to one and the same function.

As a result of the above, organization charts and selected pages of text in various of our plans required revision. Accordingly we are hereby submitting such changes to the following plans made pursuant to 10 CFR 70.32 (e), (g) and (c):

1. Category I Shutdown Facility Physical Protection Plan, Revised December 10, 1986 (Attachment 1).

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2. Fixed Site and Transportation Plan for the Physical Protection of Special Nuclear Material of Moderate and Low Strategic Significance, Revised December 10, 1986 (Attachment 2).
3. Security Officer Training and Qualification Plan, Revised December 10, 1986 (Attachment 3).
4. Safeguards Contingency Plan, Revised December 10, 1986 (Attachment 4).
5. Fundamental Nuclear Material Control Plan, Revised December 10, 1986 (Attachment 5).

The plan changes have been identified by a ruled margin. Please revise your copies of the above plans.

Note that the new reporting relationship between Human Resources and Mr. Graves as a member of the Board of Directors is represented on the organization charts by a "double," or "partitioned," box representing Mr. Graves' dual position as a member of the Board of Directors and as a Senior Vice President. Also, note that the Security organization charts have been revised to include "Security Administration," which reports to "Manager, Security." This is not an organizational change, rather it is simply providing additional information about the composition of the Security organization.

If you have any questions regarding the above, please contact me at (619) 455-2823.

Very truly yours,

Keith E. Asmussen

Keith E. Asmussen, Manager
Licensing, Safety and
Nuclear Compliance

KEA/mk

Attachments:

1. Instruction sheet and revised pages, Category I Physical Protection Plan
2. Instruction sheet and revised pages, Category II and III Physical Protection Plan
3. Instruction sheet and revised pages, Guard Training and Qualification Plan
4. Instruction sheet and revised pages, Safeguards Contingency Plan
5. Instruction sheet and revised pages, Fundamental Nuclear Material Control Plan

cc: Dr. Willard Brown, NRC Washington

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