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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 McDONALD, D. G. PWR Project Directorate 2

SUBJECT: Forwards comments & questions on IAEC Attachment 12 re
 safeguards agreement between US & IAEA, discussed in 860708
 telcon. Info in document does not require withholding from
 public disclosure.

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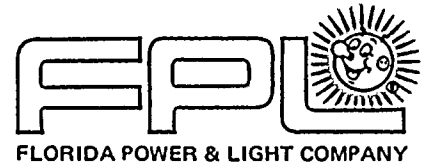
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RECEIVED
U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535
JAN 10 1960
TO DIRECTOR, FBI
FROM SAC, NEW YORK
SUBJECT: [illegible]
RE: [illegible]

Enclosed for the Bureau are two copies of a letterhead memorandum (LHM) dated and captioned as above. The LHM was prepared by the New York Office on January 8, 1960, and contains information regarding the activities of [illegible] in the New York area.

The LHM is being furnished to the Bureau for its information and for the Bureau's review of the activities of [illegible] in the New York area.

TO	FROM	SUBJECT	DATE	TIME
DIRECTOR, FBI	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
ASSISTANT ATTORNEY GENERAL	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
ATTORNEY GENERAL	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
DEPUTY ATTORNEY GENERAL	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
CHIEF OF BUREAU	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
DEPUTY CHIEF OF BUREAU	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
ADMINISTRATIVE ASSISTANT	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
RECORDS AND COMMUNICATIONS SECTION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
TRAINING AND PERSONNEL SECTION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
LABORATORY	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
IDENTIFICATION DIVISION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
INVESTIGATIVE DIVISION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
CRIMINAL DIVISION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
CIVIL DIVISION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
COMMUNICATIONS SECTION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
RECORDS AND COMMUNICATIONS SECTION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
TRAINING AND PERSONNEL SECTION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
LABORATORY	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
IDENTIFICATION DIVISION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
INVESTIGATIVE DIVISION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
CRIMINAL DIVISION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM
CIVIL DIVISION	SAC, NEW YORK	[illegible]	JAN 10 1960	10:00 AM



JUL 18 1988

L-86-301

Office of Nuclear Reactor Regulation
Attention: Mr. D. G. McDonald, Acting Director
PWR Project Directorate #2
Division of PWR Licensing - A
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. McDonald:


Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
IAEA Facility Attachment

Your letter of June 5, 1986 forwarded IAEA Facility Attachment No. 12 for Turkey Point Unit 4 (Safeguards Agreement between the USA and the IAEA, Subsidiary Arrangements). Florida Power & Light Company (FPL) has reviewed that document and does not consider any of the information included in it to be 10 CFR 2.790 material which would require withholding from public disclosure.

Specific FPL comments and questions are attached. They were discussed with NRC staff in a conference call on July 8, 1986.

If you have any questions, please call us.

Very truly yours,



C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/gp

Attachment

cc: Dr. J. Nelson Grace, Region II, USNRC
Harold E. Reis, Esq.

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ATTACHMENT I

FPL COMMENTS ON TURKEY POINT UNIT 4 IAEA FACILITY ATTACHMENT

<u>CODE</u>	<u>COMMENTS</u>
1.4	<p><u>Description</u></p> <p>The spent fuel storage capacity is 636 cells, but there are 26 cells considered as unusable due to piping, lighting, etc.</p> <p>The maximum fresh fuel enrichment U-235 is 4.10 w/o, not 3.45 w/o.</p>
2.2	<p><u>Changes in the information on the facility to be provided in advance</u></p> <p>IAEA should clarify the "type of fuel used". Does this section require that the IAEA be notified of the use of IFBA (Integral Fuel Burnable Absorber) design fuel as the fuel in IFBA rods is still UO₂.</p> <p>Revise "Change in the nuclear material accountancy and control procedures" to read "Change in the methodology for performing nuclear material accounting and control".</p> <p>How far in advance does FPL have to notify the IAEA of the intended changes? Through whom are notifications transmitted?</p>
3.2.2	<p><u>Installed Agency instruments and devices</u></p> <ul style="list-style-type: none">b) Cameras for surveillance of fuel movements into or out of the reactor vessel, the reactor containment and the fresh and spent fuel storages areas;- No camera surveillance is currently installed in the fresh fuel storage area. This should be reworded to indicate that it is not an installed device, and does the Agency plan to install one in the future?c) Seals on shipping casks with spent fuel and other containers as applicable;- A major transfer of spent fuel from Unit 4 to Unit 3 may take place while under the safeguards program. This evolution could take several months to complete. If this transfer occurs, what type of surveillance program will the agency institute to seal each cask?e) Seals on containers with fuel assemblies received at the facility;

THE UNITED STATES OF AMERICA

DEPARTMENT OF THE INTERIOR

WASHINGTON, D. C.

TO THE SECRETARY OF THE INTERIOR

FROM THE CHIEF OF BUREAU

SUBJECT: [Illegible]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

[Illegible text]

CODECOMMENTS

- Will the Agency seal every fuel container prior to its being shipped from Westinghouse? Will the agency conform to the plant's schedule of opening and unloading the new fuel? If the containers are sealed, will a neutron collar be used again to check the assemblies?

4.1

Nuclear Material Flow KMPs

- a) KMP 2/#3: Delete "Date of discharge"
- b) KMP 2/#3: (Pu) Delete the words "discharge and" from "Date of discharge and shipment"
- c) KMP 3/#2: Delete "Date of discharge"
- d) KMP 3/#3: Delete "Burn-up (MWD/tU)"

FOR a) THROUGH d) ABOVE:

FPL will provide "Date of discharge" and "Burn-up (MWD/MTU)" information only one time per assembly. Assembly discharge date and discharged assembly burnups will be provided within 30 days of the date of discharge from the reactor for assemblies currently being irradiated, and within thirty days of the receipt of the final Facility Attachment for assemblies already discharged.

- e) KMP 3/#4: Revise "Weights ... calculated as of the date of discharge" to read "as of the date of discharge from the reactor for uranium and as of the date of shipment from the facility for plutonium."
- f) KMP 3/#5: Revise "Isotopic composition ... calculated as of the date of discharge" to read "as of the date of discharge from the reactor for uranium and as of the date of shipment from the facility for plutonium."

FOR e) AND f) ABOVE:

This change is requested to account for the decay of the plutonium in the assembly during the interval between discharge from the reactor and shipment from the facility. This change reflects current methodology in use for SNM reporting.

一九五二年一月一日

1. What is the purpose of the document?
 2. What are the main points of the document?
 3. What are the key findings of the document?
 4. What are the conclusions of the document?
 5. What are the recommendations of the document?

2000年12月29日，在“2000年中国最佳新闻人物”评选中，李桂林、陆建芬夫妇双双入选。

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The *Agrobacterium* strains were grown in the medium containing 100 mg/l of tetracycline. The cell concentration of the strains was adjusted to 10⁸ cells/ml. The cell suspension was mixed with the plant tissue and the mixture was incubated for 10 min at 25°C. The plant tissue was then cultured on the medium containing 100 mg/l of tetracycline. The transformation efficiency was determined by the number of colonies on the medium containing 100 mg/l of tetracycline. The data were expressed as the mean ± SD of three independent experiments.

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

2. Once the problem is identified, the next step is to define the objectives and goals of the project. This helps to clarify what needs to be achieved and provides a clear direction for the work.

3. The third step is to develop a plan or strategy to address the problem. This involves breaking down the problem into smaller, manageable tasks and determining the resources needed to complete them.

4. The fourth step is to implement the plan. This involves putting the strategy into action and monitoring progress to ensure that the objectives are being met.

5. Finally, the fifth step is to evaluate the results of the project. This involves assessing the effectiveness of the plan and identifying any areas for improvement or further action.

1. The first step in the process of identifying a problem is to recognize that a problem exists. This is often done by comparing current performance with a desired state or goal. If there is a discrepancy, a problem is identified.

[illegible][illegible]

CODE

COMMENTS

4.2

KMPs for the physical inventory of nuclear material.

- a) KMP C/#2: Revise "Weights of total and fissile uranium and of total plutonium calculated as of the date of discharge" to read

"Weights of total and fissile uranium to be calculated as of the date of discharge and weight of total plutonium calculated as of the date of inventory."

This change is requested to account for the decay of plutonium and is consistent with current SNM reporting practices.

- b) KMP C/#3: Delete "Date of discharge"

- c) KMP C/#4: Delete "Burn-up (MWD/tU)"

FOR b) AND c) ABOVE:

FPL will provide "Date of discharge" and "burn-up (MWD/MTU)" information only one time per assembly. Assembly discharge dates and discharge assembly burnups will be provided within 30 days of the date of discharge from the reactor for assemblies currently being irradiated, and within thirty days of the receipt of the final Facility Attachment for assemblies already discharged.

5.1

Specific Provisions for Accounting Records

5.1.1

Inventory Changes

Revise "Nuclear production and nuclear loss (burn-up): When calculated, including upon discharge, and in any case before shipment" to read "Nuclear production and nuclear loss (burn-up): When reported to the NRC according to 10 CFR 75.34 and 10 CFR 75.35, including upon shipment."

Revise "Nuclear loss (Pu-241 decay): When calculated, including upon discharge, and in any case before shipment" to read "Nuclear production and nuclear loss (burn-up): When reported to the NRC according to 10 CFR 75.34 and 10 CFR 75.35, including upon shipment."

5.2

Specific provisions for operating records

5.2.1

The relevant source data with respect to nuclear loss and production, including:

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the transparency and accountability of the organization. This section also outlines the various methods used to collect and analyze data, ensuring that the information is reliable and up-to-date.

2. The second part of the document focuses on the implementation of these practices across different departments. It provides a detailed overview of the current state of affairs, highlighting areas where improvements are needed. The text also includes a list of specific actions that must be taken to address these issues, along with a timeline for completion.

3. The third part of the document discusses the role of management in ensuring the success of these initiatives. It stresses the need for clear communication and strong leadership to guide the organization through these changes. This section also includes a discussion on the importance of employee training and development, as well as the need for ongoing monitoring and evaluation of progress.

4. The fourth part of the document provides a summary of the key findings and recommendations. It reiterates the importance of maintaining accurate records and implementing effective practices across all departments. The text also includes a final statement of intent, expressing the organization's commitment to transparency and accountability.

CODECOMMENTS

- a) The monthly integrated thermal power produced by the reactor; and
- b) The estimated burn-up (in MWD/t of uranium) for each fuel assembly.
- Will a monthly report containing the above information need to be submitted? Can the reporting frequency be reduced? What amount of detail is required?

Date and duration of any reactor shutdown.

- Is this to be reported for all reactor trips and shutdowns? What are the reporting requirements (time limits, detail, etc.)?

Date and nature of the use of fuel handling and transport equipment for the movement or likely movement of fuel.

- Records required to meet this requirement are not normally maintained, and to initiate a program to log this information would be difficult to implement. Can the Agency give some relief on this requirement, and perhaps remove the words "or likely movement"?

Revise "The estimated burn-up (in MWD/t of uranium) for each assembly" to read "The burn-up (in MWD/MTU of uranium) is to be provided within 30 days of the date of discharge from the reactor."

6. Reports System

6.2.1 Concise notes explaining the inventory changes

- a) Delete "they are to state the burn-up in MWD/t of initial U for each assembly discharged".

FPL will provide data on assembly burn-ups only one time per assembly. For assemblies already discharged from the reactor this information will be provided 30 days after the final Facility Attachment is issued; for assemblies currently in process the burn-ups will be provided within 30 days after the assembly has been discharged from the reactor.

6.2.2 Concise notes describing the anticipated operations program; subject and time of dispatch

General

1. The first part of the report is a general description of the project and its objectives.

2. The second part of the report is a description of the methods used in the study.

3. The third part of the report is a description of the results of the study.

4. The fourth part of the report is a discussion of the results and their implications.

5. The fifth part of the report is a conclusion and a list of references.

6. The sixth part of the report is a list of appendices.

7. The seventh part of the report is a list of figures and tables.

8. The eighth part of the report is a list of footnotes.

9. The ninth part of the report is a list of symbols.

10. The tenth part of the report is a list of abbreviations.

11. The eleventh part of the report is a list of acknowledgments.

12. The twelfth part of the report is a list of references.

13. The thirteenth part of the report is a list of appendices.

CODE

COMMENTS

Planned operations involving refueling; fresh fuel receipts and spent fuel shipments: To be attached to each MBR (see Code 6.3.3 below) and to cover the period until the end of the next refueling, to be updated every six months.

- Will a schedule of new fuel shipments for the next cycle on Unit 4 need to be sent to the Agency? When will first report be required?

Precise forecasts for:

- a) Date of the next refueling, physical inventory taking including date when seals are expected to be removed from the reactor; and
 - Does this include annual physical inventory in the spent fuel pool? What about seal removal on the equipment hatch?
- b) Spent fuel shipments, including information about the shipping casks to be used, and the extent to which they are expected to be filled.
 - If fuel shipment from Unit 4 to Unit 3 occurs, what information will the Agency like to see? What minimum notification will be acceptable?

6.3 Specific Provisions for Material Balance Reports (MBR)

6.3.1 MBR Contents

- a) Clarify the term "consolidated inventory changes". Does this mean that MBRs are to be filled using total quantities of SNM vs. assembly-wise reporting?

6.3.2 PIL Contents

- a) Add "The batch data included in PIL's may be submitted in any form agreed upon between the facility and the IAEA, including computerized output from SNM tracking codes. When batch data is submitted in such a manner, consolidated inventories may be reported on DOE/NRC Form 742C (Physical Inventory Listing)".

6.4 Special Reports

Specification of incidents or circumstances requiring submission of special reports.

- a) Losses:

SECRET

SECRET

1. The purpose of this document is to provide information regarding the activities of the [redacted] and the [redacted] in the [redacted] area.

2. The [redacted] has been observed in the [redacted] area, and it is believed that it is engaged in [redacted] activities.

3. The [redacted] is believed to be [redacted] in the [redacted] area.

4. The [redacted] has been observed in the [redacted] area, and it is believed that it is engaged in [redacted] activities.

5. The [redacted] is believed to be [redacted] in the [redacted] area.

6. The [redacted] has been observed in the [redacted] area, and it is believed that it is engaged in [redacted] activities.

7. The [redacted] is believed to be [redacted] in the [redacted] area.

8. The [redacted] has been observed in the [redacted] area, and it is believed that it is engaged in [redacted] activities.

9. The [redacted] is believed to be [redacted] in the [redacted] area.

10. The [redacted] has been observed in the [redacted] area, and it is believed that it is engaged in [redacted] activities.

11. The [redacted] is believed to be [redacted] in the [redacted] area.

12. The [redacted] has been observed in the [redacted] area, and it is believed that it is engaged in [redacted] activities.

13. The [redacted] is believed to be [redacted] in the [redacted] area.

14. The [redacted] has been observed in the [redacted] area, and it is believed that it is engaged in [redacted] activities.

15. The [redacted] is believed to be [redacted] in the [redacted] area.

CODE

COMMENTS

One or more fuel assemblies;

b) Changes in containment:

Physical integrity of a fuel assembly as an accounting unit is accidentally broken; any Agency containment and surveillance device, referred to in Code 3.2.2 is interfered with or removed in the absence of Agency inspectors, unless the Agency has been informed in advance as provided.⁴

- No time limits are specified for submission of special reports. Does this statement mean that if the Agency is notified in advance of a potential interference with or removal of their equipment, that a special report is not required? Note 4 states that this requirement (b) applies only while the cask remains in the facility. If a fuel transfer occurs, from Unit 4 to Unit 3, what will be the Agency requirements on Unit 3, which is not a safeguard facility?

8

Agency Statements

A summary statement will be made on the result of each inspection within 30 days of its completion.

A statement on the conclusions the Agency has drawn from its verification activities in respect of the facility will be made within 60 days after the end of the month in which the Agency has verified the physical inventory.

- These reports have not yet been received and the time limits have been exceeded since the inspections were performed.

General Comments

- 1) Will the requirements of this be retroactive to January 1986? If so, will events that have already occurred, such as reactor trips, need to be reported?

1. $\frac{1}{2}$ 2. $\frac{1}{2}$ 3. $\frac{1}{2}$ 4. $\frac{1}{2}$ 5. $\frac{1}{2}$ 6. $\frac{1}{2}$ 7. $\frac{1}{2}$ 8. $\frac{1}{2}$ 9. $\frac{1}{2}$ 10. $\frac{1}{2}$

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