



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PDR

AUG 15 1985

DESIGNATED ORIGINAL

SGMI:DRJ-85-44
70-734

G. A. Technologies, Inc.
ATTN.: Mr. Robert A. Wolf
Secretary
P. O. Box 85608
San Diego, California 92138

Gentlemen:

This is in response to your letter dated August 7, 1985 (your reference #696-7088) in which you outlined a proposed new organization structure relative to your operations conducted under License No. SNM-696.

As mentioned to Bill Mowry of your staff by Don Joy of this office, during a telephone conversation on August 13, 1985, we need more details concerning the new organization structure before we can properly assess whether it would be sufficient during the phase of reduced operations. In addition you should note that, based on the limited information presented in your letter, it appears that the new organization will be a decrease in effectiveness relative to commitments contained in your existing safeguards plans which are incorporated as a condition of license. This is not to say that your proposed new staffing structure would not be acceptable relative to your reduced activities, but 10 CFR 70.32 precludes you from implementing changes that decrease the effectiveness of your safeguards system (as defined by your Physical Security and Fundamental Nuclear Material Control Plans) without prior NRC approval. Implementation of your new organization structure prior to submitting revised pages to the above mentioned plans (which adequately describe the structure and responsibilities of management and supervisory positions), and prior to our approval of such submittals, could result in citation of non-compliance if the changes are deemed to be a decrease in effectiveness.

We would be happy to meet with you to discuss this matter in more detail. If you have any further questions, please contact Mike Smith (301-427-4758) or Don Joy (301-427-4756) of my staff.

Sincerely,

Willard B. Brown, Chief
Safeguards Material Licensing and
International Activities Branch
Division of Safeguards, NMSS

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