

70-1257

PDR: LTR. ONLY

**EXXON** NUCLEAR COMPANY, INC.

2101 HORN RAPIDS ROAD, PO BOX 130, RICHLAND, WA 99352  
(509) 375-8100 TELEX: 15-2878

Process & Equipment Engineering  
Department



September 24, 1985

PDR-Ltr  
only



Willard B. Brown, Chief  
Fuel Facility Safeguards Licensing Branch  
Division of Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

License No. SNM-1227  
Docket No. 70-1257

Dear Mr. Brown:

Enclosed are two copies of our Fundamental Nuclear Material Control (FNMC) Plan which is submitted in accordance with 10 CFR 74.31(b)(1). The FNMC Plan is Revision 16 to XN-12, "Nuclear Materials Safeguards Procedures Description for the Fuel Fabrication Plants." Also enclosed are two copies of an Annex which is submitted in accordance with the guidance given in NUREG-1065 Revision 1. The Annex explains the basis of the FNMC Plan and how implementation of the FNMC Plan will meet the requirements of 10 CFR 74 and the safeguards affirmations described in NUREG-1065 Revision 1.

Section IV of the Annex describes the basis of and our proposed values for the Detection Quantity and the Detection Threshold. If our basis and proposed values are acceptable to NRC, that part of the Annex may be incorporated into the FNMC Plan by reference.

Section IV of the Annex also contains a request for a special license condition for meeting the requirements of 10 CFR 74.31(c)(4) by an alternative method. Our reasons for that request are also given.

To aid in the review process, two special reviewer copies are being submitted under separate cover to D. R. Joy.

The enclosed FNMC Plan and Annex are proprietary in accordance with 10 CFR 2.790(d).

We are sending under separate cover a check for \$150 for the filing fee to the License Fee Management Branch.

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AN AFFILIATE OF EXXON CORPORATION

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Mr. W. B. Brown  
September 24, 1985  
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if you have any questions, please call me on (509) 375-8672.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. A. Schneider".

R. A. Schneider  
Staff Specialist - Safeguards

RAS:jrs

Attachments  
As Stated

cc: M. D. Schuster - NRC Region V