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From: Charles E. Gaskin <ceg1250@aol.com>
To: TWFN_DO.twf4_po(AXP1,ALB2)
Date: Wed, Mar 22, 2000 1:20 PM
Subject: Draft Report Comments: SR1718 - Draft - Standard Review Plan for the Review of an Application for a Mixed Oxide (MOX) Fuel Fabrication Facility

Below is the result of your feedback form. It was submitted by
Charles E. Gaskin (ceg1250@aol.com) on Wednesday, March 22, 2000 at 13:20:12

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Comments: Chapter 13.0 Safeguards - describes the application of physical protection and material control and accounting plans. Other chapters describe similar submittals in their respective area. The primary difference is the construction permit submittal versus the final licensing application. Part 70 clearly indicates the submittal should be a two step process. However, Chapter 13 would indicate that the submittal should be a final detailed submittal. This appears to be inconsistent. Would NRC accept a "less than final" submittal with declarations of intentions for each of the regulatory requirements along with some site specific details? One could expect the final design of the physical protection program to be somewhat different from the initial construction submittal. If a "less than final" submittal is acceptable what would be the basis for the acceptance review?

Thank you

Charles E. Gaskin

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