

Information Circular

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Communication of 5 March 2004 from the Permanent Mission of the Islamic Republic of Iran concerning the Report of the Director General contained in GOV/2004/11

1. The Secretariat has received a Note Verbale dated 5 March 2004 from the Permanent Mission of the Islamic Republic of Iran attaching “*Comments and Explanatory Notes by the Islamic Republic of Iran on the Report of the IAEA Director General (GOV/2004/11).*”
2. As requested in the Note Verbale, the attachment is reproduced herein for the information of Member States.

**Comments and Explanatory Notes by
The Islamic Republic of IRAN
on the
Report of the IAEA Director General (Gov/2004/11)**

The Islamic Republic of Iran is pleased that the report has confirmed Iran's full and active cooperation with the Agency with a view to conclusively resolve all outstanding issues. While Iran recognizes the professionalism and hard work of the Secretariat, it is necessary to clarify a number of inadvertent omissions in the report and augment the information in other parts:

1. Iran's implementation of the Additional Protocol prior to its ratification by the Parliament, which is a clear indication of a voluntary political undertaking for utmost cooperation and transparency, has been omitted from paragraph 5 of the report.
 - a. As of the date of DG's report, six complementary accesses with two hours notice have been granted.
 - b. The complementary accesses to the ENTC & Karaj referred to in paragraph 4 were granted prior to Iran's signature of the Additional Protocol (18 December 2003).
 - c. According to Article 4 of the Additional Protocol, complementary access could be performed after declarations are submitted by the Member States, for the purpose of verification of the declared activities and absence of undeclared activities. The purpose may have been to avoid misunderstandings arising from possible discrepancies with the final full picture that should be reported in accordance with

the Protocol. Although the requests by the Agency for complementary access prior to the submission of declarations were not legally justified, complementary accesses were granted by Iran in the spirit of cooperation and confidence (referred to in the report).

2. Destruction of dismantled equipment and components of the R&D of uranium conversion projects by Iran under the supervision of the Agency inspectors, on 14 January 2004, is not duly reflected in paragraph 19 of the report.
3. The total amount of plutonium produced is estimated by the Agency to be 2mg maximum (as declared by the DDG for safeguards during the briefing for members of the Board of Governors on 27 February 2004). Therefore, the phrase "substantially higher" in paragraph 26 may be misleading. The project manager explained during the inspection that due to lack of experience in solvent extraction and safety concerns and radiation hazards by using existing glove box instead of well equipped Hot-Cells, it had not been possible to extract more plutonium than reported and presented for verification by the Agency.
4. In paragraph 37, the phrase "most of the workshops are owned by military industrial organizations" is not correct. As detailed in the documents submitted on 21 October 2003, three out of ten workshops which have been involved in manufacturing centrifuge components belong to the Defense Industry, and they have already been inspected by the Agency. The agency is aware that high precision machines are primarily owned by the Defense Industry

Organization which produces parts and components under contract for various private and government owned companies.

5. In paragraph 38, the phrase "managed access" is incorrect, since during the inspections, the Agency inspectors were granted full and unrestricted access.
6. Detailed explanation by Atomic Energy Organization of Iran on the results of the environmental sample analysis referred to in paragraphs 39 and 40 have been submitted to the Agency on 16 February 2004, the assessment of which does not seem to be finalized yet.
7. Information on two workshops called Farayand Technique in Esfahan and Pars Tarash in Tehran which has been involved in manufacturing centrifuge components had already been submitted to the Agency in the declaration of 21 October 2003. Thus, the phrase "revealed the existence" in paragraph 41 is incorrect.
8. In reference to paragraph 57, the Agency inspectors have been informed about the reason for lack of detailed final information on dimension and actual layout of the hot cells adjacent to the heavy water reactor. One of the main reasons is unavailability of manipulators for hot cells, on the basis of which the exact dimension of hot cells could be decided. In this respect the inspectors were also informed that attempts to purchase manipulators from abroad have not been successful.
9. In Reference to paragraph 75, it is important to note that as recently confirmed by public accounts of a third country investigations, the components that were sold to Iran had been previously used. Thus,

shedding light on the source of contamination for which Iran cannot provide a conclusive account.

10. The issue of irradiation of bismuth metal samples to produce polonium-210 has been thoroughly discussed with inspectors in Iran and a 41-page document presented to the IAEA. The issue was also explained during the briefing on 27 February 2004. In this regard, it is important to note that:
 - a. As it has been reflected in paragraph 28, declaration of bismuth irradiation is not required under the Safeguards Agreement.
 - b. The project was aborted more than 13 years ago.
 - c. Complete information about irradiation of two bismuth samples in TRR were recorded in the logbook of the reactor which has been under Agency safeguards for almost thirty years. The issue of bismuth irradiation was never raised before.
 - d. In this research project, only two Bismuth samples (0.5 and 1.5 gram) had been irradiated, and an attempt had been unsuccessfully made to extract polonium from the first sample. The research project was terminated 13 years ago, since the chemist in charge of the project left the country permanently. The second sample was not processed and was later discarded as waste due to its short half life.
 - e. The intention was not to make neutron source. Therefore, Beryllium, which is essential for neutron source with po-210, was not ordered when the required items were procured from

abroad. The supporting procurement documents have been submitted to the Agency.

- f. According to scientific and technical literature submitted to the Agency, Po-210 has various applications for peaceful purposes including RTGs. Even in a purely hypothetical scenario of the intention to use Po-210 for production of neutron source, the neutron source had several theoretically sound peaceful applications, including reactors, neutron logging in oil and gas explorations and other neutron activation analyses.
 - g. Iran invited the chemist in charge of the project who had left Iran to travel to Iran in order to be interviewed by the inspectors and clarify the nature, scope and intent of his research and the reasons for its termination.
11. As far as the P_{II} design of centrifuge is concerned, the following points have to be taken into consideration:
- a. The national project on centrifuge enrichment has been based on P_I design. The Natanz pilot plant has been constructed on that basis.
 - b. During discussions of the IAEA experts with Iranian centrifuge experts as early as summer of 2003, the issue of research on different models and dimensions of centrifuge components particularly rotors (different from P_I design) had been raised by Iranian experts. Therefore the Agency was informed of the R&D project well in advance. The display of a small rotor, which is not of P_I design, in the exhibition hall in Natanz during the visit of the

Director-General and his delegation in February 2003 proves the absence of any intention for concealment.

- c. Attention should be drawn to the fact that only general engineering design of P_{II} was received and no detail or manufacturing design. No component of P_{II} has been obtained from the intermediary. Only a handful of components, rotor tubes with different dimensions, have been locally manufactured by a private company. The components have been voluntarily presented to the Agency inspectors in January 2004. This research project has been terminated due to contractual problems.
 - d. According to comprehensive Safeguards Agreement (INFCIRC/153), the Islamic Republic of Iran was not required to report to the Agency information on P_{II} drawings and the handful of rotor tubes (domestically made), since neither construction of a nuclear facility nor nuclear material was involved.
 - e. The declaration of 21 October 2003 was clearly meant to complete the picture with regard to issues required under Iran's safeguards agreement. Therefore, the conclusion that omission of reference to P_{II} R & D questions the completeness of the full disclosure is not justified. Iran intended to submit information on R&D of P_{II} along with further declarations it is required to provide in accordance with its obligations under the Additional Protocol within the timetable established by the IAEA.
12. As far as the R&D on uranium conversion (Section B of the report) is concerned, it is recalled that during the past 25 years, a total amount of about 50 Kg of natural uranium in the form of yellow cake

(U308) has been used in various research projects in ENTEC and TNRC, while more than 530 tons of yellow cake has remained unused and under the Agency's Safeguards for several years. In spite of the misleading impression that the previous reports may have produced, the said research projects have not been confidential. The presented papers on uranium conversion in the International Conference on Nuclear Science and Technology held in Bushehr in 1985, as well as the detailed information on Iranian activities on uranium conversion reflected in the IAEA fellowship application forms by AEOI experts, proves this assertion. Relevant documents have already been submitted to the inspectors.