

Issue	JCPA Framework	Necessary Safeguards	Addressed in JCPA Framework?
<b>Enriched-Uranium Breakout</b>			
<i>Natanz Enrichment Facility</i>			
Centrifuges	5,060 operating IR-1	Place 10,000+ dismantled centrifuges (incl. advanced centrifuges) under indisputable IAEA control in physically remote off-site storage.	“IAEA monitored storage” – unclear if centrifuges would be disassembled and placed under IAEA lock and key.
		Ensure operating centrifuges can only be replaced with those from IAEA monitored storage.	Unclear how IAEA would verify replacement process.
Enrichment Level	3.67% low-enriched uranium (LEU)	Monitor the feed, product and waste of every cascade.	Unclear what is meant by “regular access.” Additional Protocol would not guarantee anytime, anywhere inspections within cascade halls.
		Verify removal of tubes interconnecting cascades.	
Research & Development (R&D)	“Limited R&D with advanced centrifuges.”	Ensure absence of activities that could potentially improve centrifuge performance and manufacturing.	Unclear what is meant by “regular access.” Additional Protocol would not guarantee anytime, anywhere Natanz access.
<i>Fordow Nuclear Research Facility</i>			
Centrifuges	1,044 installed IR-1	Place ~1,700 dismantled centrifuges under IAEA control in off-site storage.	“Continuous IAEA monitoring” – unclear if centrifuges would be disassembled and placed under IAEA lock and key.
		Verify removal of tubes within and interconnecting cascades in 1,044 remaining installed centrifuges.	Unclear what is meant by “regular access.” Additional Protocol would not guarantee anytime, anywhere inspections within cascade halls.
Enrichment Level	No fissile material	Verify absence of unenriched uranium hexafluoride (UF6) gas or LEU.	Unclear what is meant by “regular access.” Additional Protocol would not guarantee anytime, anywhere Fordow access.
R&D	No R&D “associated with uranium enrichment.”	Verify absence of gases that could be inserted into centrifuges to improve uranium enrichment efficiency.	
<i>LEU Stockpiles</i>			
20% LEU	Prohibited	Verify elimination of existing stockpile in uranium oxide (UO2), scrap and waste forms via: protected channel for sale abroad, ship-out for conversion to fuel rods, and/or fabrication into fuel plates.	Lack of clarity on how stockpile will be eliminated.
< 5% LEU	< 300 kg of < 3.67% LEU	Verify reduction of existing stockpile via: protected channel for sale abroad, ship-out for conversion to fuel rods, and/or dilution to 0.7 percent unenriched UF6.	Lack of clarity on how stockpile will be reduced or safeguarded.
		All stockpile in excess of 300 kg under airtight safeguards.	
0.7% Unenriched UF6	No parameter	Continuous monitoring of stockpiles and conversion rate from yellowcake to detect production in excess of requirements for feed for Natanz.	Not addressed.
<b>Plutonium Breakout</b>			
IR-40 Reactor Core	Remove core; replacement “will not produce weapons-grade plutonium.”	Verify conversion to light water reactor and oversee construction and operation of rebuilt reactor.	Lack of clarity on modified reactor design or safeguards.
Heavy Water	No stockpiles in excess of needs for modified reactor.	Verify permanent halt to all production, and ship-out of all existing stockpiles.	No. Iran’s heavy water needs for modified reactor should be zero. Lack of clarity on safeguards.
Reactor Fuel	No parameter	Establish procurement channel for 3.5% LEU to fuel redesigned, light water reactor.	Not addressed.
Spent Reactor Fuel	Ship out all fuel	Verify removal of all spent fuel.	No mention of safeguards.
Reprocessing/R&D	Prohibited	Inspections to confirm absence of reprocessing/R&D facilities.	
<b>Sneakout</b>			
Possible Military Dimensions (PMD)	Agreed set of measures to address PMD concerns.	Full and complete declaration by Iran of entire nuclear program past and present.	Additional Protocol would not require this.
		Resolution of all concerns in IAEA PMD portfolio.	Iran would only “address,” not resolve, PMD concerns.
		Unrestricted IAEA access to suspected nuclear-related personnel and military sites.	Not addressed.
New Nuclear Facilities	No new uranium enrichment facilities or heavy water reactors.	Full and complete declaration by Iran of entire nuclear program past and present.	Additional Protocol would not require this.
		Ratification by Iran of Modified Code 3.1.	Iran would only implement, not ratify, Modified Code 3.1.
Potential Undeclared Nuclear-Related Facilities	IAEA access for suspicious sites or allegations of covert facility anywhere in the country.	Full and complete declaration by Iran of entire nuclear program past and present.	Additional Protocol would not require this.
		IAEA authority to inspect suspected undeclared sites anytime, anywhere.	Additional Protocol would not guarantee anytime, anywhere access.
		Unrestricted IAEA access to all nuclear-related personnel.	Not addressed.
Potential Diversion of Nuclear Materials	IAEA access to nuclear supply chain.	Anytime, anywhere IAEA access to declared or suspected uranium mines, yellowcake production and conversion facilities, and heavy water production plants.	Lack of clarity on what safeguards would “prevent diversion to a secret program.” Additional Protocol would not guarantee anytime, anywhere access.
Procurement of Illicit Nuclear-Related Items	Dedicated procurement channel to monitor import of nuclear-related items.	IAEA oversight of procurement mechanism for all potential dual-use imports and exports.	Lack of clarity on oversight authority for procurement channel; would not include exports from Iran.