### ADDRESSING CONCERNS REGARDING THE IRANIAN NUCLEAR PROGRAM - RESPONSE

<table>
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<tr>
<th>TOP LINE</th>
<th>With P5+1 JCPOA</th>
<th>Without P5+1 JCPOA (Administration)</th>
<th>Response</th>
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<tr>
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<td>There will be an extensive and extended rollback (15 years) of Iranian nuclear activities, including reduced uranium enrichment and enriched uranium stockpile, resulting in a considerably extended breakout time.</td>
<td>There is a growing Iranian nuclear program now with limited detection and verification capability.</td>
<td>During these 15 years, nuclear activities continue as Iran will be researching and producing advanced centrifuges. The breakout time is close to 7 months if either IR-2 centrifuges are reinstalled or 20% fuel plates are further enriched. If during a breakout, spent fuel from the light water reactor at Bushehr is reprocessed, many weapons worth of plutonium would be very quickly produced.</td>
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<td>Iran has committed to permanently adhere to the Additional Protocol, which provides the basis for access to suspicious sites and enables the IAEA to have a fuller picture of a wide range of nuclear activities in Iran, including activities that don’t involve uranium or plutonium.</td>
<td>The likely unraveling of international sanctions will bring economic relief for Iran without the JCPOA benefits of restricted nuclear activity and strong verification. This loss of JCPOA benefits would be a negative outcome for the U.S. and our allies.</td>
<td>If there is access to suspicious sites under the Additional Protocol, why isn’t the IAEA allowed into Parchin? According to the JCPOA, Iran has not ‘committed to’ but is only abiding by the Additional Protocol. In 8 years this Protocol will have to be approved by the Majid to be ratified. They are not obligated to approve – seems the Iranian Parliament does get a vote.</td>
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<td>The JCPOA provides for unique and very strong verification of centrifuge manufacturing for 20 years and uranium production for 25 years, effectively blocking a covert enrichment program for a quarter century. In addition, permanent provisions bar Iranian weaponization.</td>
<td>There will be a loss of international unity in confronting Iran, thereby diminishing our effectiveness and our authority for a strong response to Iranian non-compliance.</td>
<td>Unless we have a better accounting of decades of past procurement of raw materials, cross-matched with sales records of international suppliers, we will not know how many covert centrifuge components or even assembled centrifuges Iran has in reserve. The IAEA will only be numbering and monitoring those components declared by Iran. Same with monitoring the fuel cycle. It is not just how much uranium they are mining but how much natural uranium Iran has in reserve from large purchases from South Africa and China. Were there additional purchases? If we are not sure of these answers, we cannot be sure that all covert paths to the bomb are blocked.</td>
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<td>The JCPOA underscores international unity, which was crucial for both sanctions effectiveness and for negotiating a very strong JCPOA. This unity serves as a deterrent to Iranian non-compliance.</td>
<td>It would be unfortunate to lose this unity but it is not so great a loss that we should rush into a flawed agreement without even examining our options, especially in the approximately 6 months until implementation day. In addition, unity for deterrence cannot be taken for granted once the P5+1 have significant financial interests in Iran.</td>
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<td>The JCPOA includes a direct commitment by Iran to the U.S. as a member of the P5+1 to never develop or acquire a nuclear weapon.</td>
<td>There will be no commitment from Iran to the P5+1 to refrain from developing or acquiring weapons-relevant technologies.</td>
<td>Iran is already committed to refrain from becoming a nuclear weapons state under the NPT. Do they have to commit twice for us to believe them?</td>
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<td>o Establishes strong case for robust unilateral or multilateral response to any serious</td>
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<td>As the cases of small or moderate violations have no specified penalties, such violations</td>
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violation.

There is a permanent ban on Iranian development of key nuclear weaponization capabilities.

There is a long-term ban (15 years) on Iranian acquisition of, and research and development (R&D) on, plutonium and uranium (or alloy) metal, a key weaponization activity.

A dedicated procurement channel is established to monitor procurements in order to identify any evidence of possible covert activities associated with certain nuclear-related and dual use items.

Iran cannot engage in reprocessing, which results in separation of plutonium, closing off a pathway to a bomb.

Post-irradiation examination of nuclear fuel by Iran could proceed, enabling an avenue for development of plutonium separation capability relevant to weapons development.

It is very positive to limit enrichment although why should Iran be able to enrich at all? They have a right to domestic nuclear power but not enrichment. Giving up 75% of existing centrifuges is not a huge sacrifice for Iran as the vast majority are IR-1s that are the least efficient models and will not be reinstalled. However, by year 10, Iran will have developed ir-8s that are 16 X faster. Production starts in year 8 and installation in year 10.

Research will allow experiments with 2 cascades of each type of advanced centrifuge in year 8, as well as manufacturing of components. As the product of this enrichment will be down blended, we will not be able to assess the efficiency of these machines nor be able to calculate an accurate breakout as they are installed.

There will be much less insight into possible covert Iranian weaponization activities and no new constraints on development of weaponization capabilities.

Iran could develop weapons-relevant capability through uranium metal R&D.

Absent the establishment of a dedicated procurement channel with Iran, illumination by inspectors of possible covert activity will be more difficult.

For 15 years only. However, quick and dirty reprocessing can be set up quickly in very small spaces and are difficult to detect.

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SCOPE/SCALE OF NUCLEAR PROGRAM

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<td>Nearly 75% of Iran’s existing centrifuges will be removed and not allowed to operate for a period of 10 years, and only the least effective design will be permitted to enrich uranium at far below weapons usable levels. Excess centrifuge infrastructure is removed.</td>
<td>Iran has already produced around 20,000 centrifuges and could expand significantly for the next 10 years.</td>
<td>It is very positive to limit enrichment although why should Iran be able to enrich at all? They have a right to domestic nuclear power but not enrichment. Giving up 75% of existing centrifuges is not a huge sacrifice for Iran as the vast majority are IR-1s that are the least efficient models and will not be reinstalled. However, by year 10, Iran will have developed ir-8s that are 16 X faster. Production starts in year 8 and installation in year 10.</td>
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<td>Development of next generation centrifuges by Iran (roughly 5 times more powerful than the current model) is severely limited and subject to monitoring for 10 years. Deployment of advanced centrifuges is prevented for at least 10 years.</td>
<td>Iran has already deployed and will soon start operating next generation centrifuges (5 times more powerful) and advance an array of even more powerful centrifuges in the next 10 years.</td>
<td>Research will allow experiments with 2 cascades of each type of advanced centrifuge in year 8, as well as manufacturing of components. As the product of this enrichment will be down blended, we will not be able to assess the efficiency of these machines nor be able to calculate an accurate breakout as they are installed.</td>
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| **A combination of constraints results in a**
| **“breakout time”** (that is the time to produce**
| **enough nuclear material for a first bomb if**
| **Iran were to race to a bomb) of at least a**
| **year, for a period of 10 years. Together with**
| **enhanced monitoring, this affords ample**
| **time for a response.**
| **Iran’s current breakout time is about 2-3**
| **months, and will shorten further with more**
| **centrifuges, more advanced centrifuges, and**
| **a growing stockpile of enriched uranium.**
| **Iran’s current low-enriched uranium stockpile**
| **(over 10,000 kg), enough for about 10**
| **weapons if further enriched, can continue to**
| **grow without constraint.**
| **Iran could resume enrichment to near 20%**
| **or greater, further shortening an already short**
| **breakout time.**
| **Fordow will continue to enrich uranium,**
| **likely including near 20% enrichment, well on**
| **the way to weapons-grade uranium.**
| **starting in year 10.**
| **Iran’s stockpile of low-enriched uranium will**
| **be reduced by 98%, leaving an amount that is**
| **much less than is needed for even a single**
| **nuclear weapon (limited to 3.67%**
| **enrichment and 300 kg of UF6).**
| **Iran’s material with the highest enrichment**
| **(near 20%) will be entirely eliminated as a**
| **threat for potential weapons development.**
| **Fordow, Iran’s underground enrichment**
| **facility, will have most of its centrifuges and**
| **infrastructure removed and will be used**
| **exclusively for stable/medical isotope activity**
| **and other physics activities with international**
| **collaboration (15 years).**

| **There is a 12 month breakout for 10 years**
| **only if: there are no incremental violations**
| **(which carry no specified penalties) that**
| **could shorten breakout such as building up**
| **LEU stocks to over 300kg; none of the 1200**
| **Ir-2s are reinstalled in a breakout - these**
| **efficient centrifuges may cut breakout to 7**
| **months; no 20% fuel plates or uranium oxide**
| **is used which can cut several months; Iran**
| **does not seize the reactor fuel and spent fuel**
| **at the light water reactor at Beshehr which**
| **lacks sufficient oversight and could quickly**
| **provide both LEU uranium and enough**
| **plutonium for dozens of bombs after ‘quick**
| **and dirty’ reprocessing. Such a reprocessing**
| **facility is very small and difficult to identify,**
| **In addition, after 10 years breakout shortens**
| **just as our enrichment oversight ends. In year**
| **13 there is a 6 month breakout. Soon after**
| **year 15 the breakout goes to a few days.**
| **Over 1000kg of 3.76 UF6 is required to be**
| **further enriched to get a critical mass of fuel**
| **for a single nuclear weapon. Although there**
| **is a cap of 300kg for 15 years, the 5000**
| **centrifuges allowed will produce an**
| **additional 100 kg (1/3 of the total allowed**
| **amount) of UF6 every month. Lots of**
| **opportunity for incremental cheating.**
| **There is still potentially usable 20% enriched**
| **uranium in the unirradiated fuel plates of the**
| **Tehran Research Reactor. This material could**
| **shorten breakout times by several months**
| **and is not currently counted towards the**
| **uranium cap of 300kg LEU (a Technical**
| **Working Group takes a year to assess).**
| **Fordow will retain almost 40% of its**
| **centrifuge capacity with 1044 IR-1s arranged**
| **in 6 cascades. The 2 cascades slated for**
| **stable isotopes are not a problem, however,**
| **the other 4 cascades are installed, on stand-**
| **by and are ready to contribute to shortening**
| **breakout if required. After 10 years, much**
| **more efficient centrifuges can be installed up**
| **to the 16 cascade capacity of the FFEP. All in**
| **a hardened and protected facility.**

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The Arak reactor in Iran, now capable of becoming a "weapons-grade plutonium factory" that could produce material for 1-2 weapons per year, will be replaced by a research reactor that does not produce weapons-grade plutonium in normal use. Iran will not build any more heavy water reactors for at least 15 years.

- Misuse of the reactor to produce weapons-grade plutonium can be detected quickly, allowing ample time for response.
- The irradiated fuel, which contains plutonium, will be sent out of the country for the reactor’s lifetime.
- Iran will not reprocess any irradiated fuel, which could lead to the extraction of plutonium for a weapon, for at least 15 years.
- Iran will not accumulate heavy water, which is often associated with plutonium production, excess to the needs of the new Arak design.

The current Iranian Arak reactor design will be implemented, producing significant amounts of plutonium.

- Plutonium-bearing irradiated fuel will remain in Iran and could be reprocessed to extract plutonium for weapons.

 commitments are put in place, including daily access to Iran’s major nuclear facilities. Iran could, after 15 years, continue to develop its peaceful nuclear program, but strong verification measures would be ongoing and there would be an enduring commitment to not pursue nuclear weapons or weaponization activities.

- Iran’s current nuclear program will grow immediately and will do so without the enhanced JCPOA verification measures in place to warn the global community about any non-peaceful activities.

This solution seems to work specifically for the Arak reactor - as long as the spent fuel is taken out of Iran. However, Iran does not 'intend to' but has the right to build additional heavy water reactors after 15 years. Iran has also has backpedaled from the framework which specified an indefinite ban on reprocessing. Instead, Iran will refrain from reprocessing activities for only 15 years.

This is a good approach if spent fuel, which still contains some plutonium, is removed from Iran.

<table>
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<tr>
<th>VERIFICATION</th>
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<td>Significant verification measures are put in place, including daily access to Iran’s major nuclear facilities. Iran could, after 15 years, continue to develop its peaceful nuclear program, but strong verification measures would be ongoing and there would be an enduring commitment to not pursue nuclear weapons or weaponization activities.</td>
<td>Iran’s current nuclear program will grow immediately and will do so without the enhanced JCPOA verification measures in place to warn the global community about any non-peaceful activities.</td>
<td>After year 15, the verification at declared sites is the NPT with the Safeguards Agreement, Additional Protocol and Modified code 3.1 which have all been in place previously and have been violated by Iran. It is very concerning that the enhanced enrichment oversight terminates as Iran is allowed to install advanced centrifuges (year 10) and as limits on quantity and purity of uranium enriched end (year 15). Iran will be left with an industrial sized enrichment capacity and virtually instantaneous breakout time.</td>
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<td>Iran has committed to adhere to the Additional Protocol indefinitely, which enables the IAEA to have a fuller picture of a wide range of nuclear activities in Iran, including activities that don’t involve uranium or plutonium. It also allows IAEA inspectors to request access with 24 hours’ notice to any location for which it has reason to suspect undeclared nuclear activity.</td>
<td>Iran likely will not implement the Additional Protocol, eliminating a substantial protection in the JCPOA that affords the IAEA clear authority to access to any suspicious location. Iran is likely to continue past instances of denying or significantly delaying IAEA access to suspect sites.</td>
<td>While there is good oversight in declared facilities for 15 years, the access to undeclared or suspicious sites are very problematic. Parchin is a primary example. Concerning the Additional Protocol, the JCPOA says that Iran will provisionally abide by the AP consistent with the role of the President and the Parliament – that does not seem like an indefinite commitment. In 8 years this Protocol will have to be approved by the Majid to be ratified. They are not obligated to approve.</td>
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<td>Iran will permanently implement an IAEA provision that requires early reporting of new nuclear facilities or design changes to existing facilities, so that Iran has no excuses for hiding any covert facilities or renovations</td>
<td>Iran is likely to continue to refuse to provide the IAEA with early notice of new facilities, which denies the IAEA the ability to develop inspection strategies as a facility is being built.</td>
<td>Iran has a history of clandestine facilities, such as Fordow, even though Iran has agreed to abide by the Modified Code 3.1 since 2003.</td>
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Iran will be subject to unique and important verification measures beyond the Additional Protocol.

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<th>The IAEA will have uranium supply chain surveillance for 25 years, greatly increasing the risk of Iran getting caught if it diverts nuclear material for weapons development.</th>
<th>Iran’s uranium supply chain will be less transparent and therefore more susceptible to diversion of uranium.</th>
<th>A NPT country in violation of that accord should not be allowed to enrich however, once Iran is allowed to enrich, the burden of verifying becomes much more difficult. It is nearly impossible to absolutely verify the terms of the JCPOA if Iran is determined to cheat.</th>
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<td>The IAEA will be able to track centrifuge manufacturing for 20 years, eliminating the risk of diverting centrifuges to a covert enrichment facility.</td>
<td>IAEA has no insight into the number of centrifuges Iran manufactures. This could lead to Iran diverting centrifuges to a covert facility without detection.</td>
<td>Clarity in past procurement is required for this oversight to succeed and we need an adequate baseline from which to start. Iran’s stock of enriched uranium comes from purchases of natural uranium from China and Iran decades ago. How much natural uranium does Iran still have in reserve from these large purchases? Were there additional purchases?</td>
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<td>The IAEA will, for the first time, have an assured time period for access to suspicious sites (within as little as 24 hours or a maximum of 24 days if there is a dispute), a period that is short enough to provide high confidence in detecting covert activity, especially the needed work with nuclear materials to develop a weapon.</td>
<td>Iran can stall the IAEA indefinitely.</td>
<td>This is true for newly manufactured centrifuges however, unless we have a better accounting of decades of past procurement, we will not know how many covert centrifuge components or even assembled centrifuges Iran has in reserve.</td>
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<td>The IAEA will be able to use advanced safeguards technologies.</td>
<td>Iran is likely to continue to deny IAEA use of advanced technologies resulting in additional time and resources to detect diversion of nuclear materials.</td>
<td>If the IAEA has concerns about suspicious activity at undeclared sites, they need to inform Iran and request clarification. There is no time limited stated for Iran to reply. If the issue cannot be resolved, the IAEA can request an inspection, starting a process capped at 24 days. That implies that this process could take longer than 24 days. This need clarification.</td>
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<td>Iran is required to take steps to engage with the IAEA with respect to completing its investigation of possible military dimensions (PMD) of nuclear activity before 2004, so that the IAEA can complete its assessment of Iran’s previous activities related to nuclear weapons.</td>
<td>Iran is likely to continue not to cooperate with the IAEA on PMD.</td>
<td>Will cybersecurity be an issue with electronic surveillance? Iranian hackers have recently been able to infiltrated the US Navy intranet and have become very sophisticated. Hacking into these safeguard technologies could compromise verification.</td>
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<td>The ability to detect any possible efforts by Iran to develop a nuclear weapon will be greatly elevated, thereby providing a strong deterrent.</td>
<td>Iran could carry out nuclear weapons related work with much less risk of detection.</td>
<td>The JCPOA requires a dialogue between the IAEA and Iran and an assessment due by 12/15/15. Although a resulting resolution by the Board of Governors will outline needed action, it seems that there is no requirement for a satisfactory resolution to PMD before Implementation Day. Current activity at Parchin is just one indication that Iran is still not cooperating on PMD.</td>
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<td>While this is certainly crucial, it seems likely that Iran would develop such a weapon at non-conventional sites where we have less access. Our national security will depend on</td>
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The President has emphasized pathways to an Iranian nuclear weapons enforcement.

The international sanctions regime will likely unravel, since other parties viewed sanctions as a successful part of a strategy for getting Iran to the negotiating table. Without robust international sanctions implementation, it is likely that more resources will flow to Iran but will do so without the nuclear constraints

\[\text{With P5+1 JCPOA} \quad \text{Without P5+1 JCPOA (Administration)} \quad \text{Response}\]

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<th>International Unity in Addressing Iranian Nuclear Weapons Development</th>
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<td>The hard-won international unity exhibited in the negotiations by the P5+1 and EU, and in applying sanctions by a large community of nations, will not be disrupted, providing confidence in a strong unified response should Iran contravene these agreements.</td>
<td>The loss of international unity will weaken U.S. moral authority and collective backing for any response to potential Iranian actions, whether diplomatically, financially, or militarily.</td>
<td>We may lose unity but we need to do what is right and we have the upper hand in the morality issue – Iran cannot be trusted to be just a decision away from becoming a nuclear weapons state – not now and not in 15 years. If we do not endorse this deal, many global players would shy away from doing business with Iran due to the uncertain environment that would be created.</td>
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<td>The P5+1 and the EU invested an enormous effort in a difficult negotiation aimed at concerns regarding the Iranian nuclear program, reflecting united and substantial P5+1 interest in a strong nuclear non-proliferation treaty (NPT) regime.</td>
<td>It is exceedingly unlikely that our partners or Iran will renegotiate what is already a very strong deal, with no serious prospects for improvement. Iran’s nuclear program will continue, unencumbered by the significant restrictions in the JCPOA. There is no credible Plan B. U.S. credibility to address other regional issues, including with a coalition of major powers, will be severely compromised.</td>
<td>NP should be a key consideration and there is too high a likelihood that this deal could compromise or lead to the end of the NP regime in the Middle East. Will Iran’s neighbors trust Iran to be a decision away from having nuclear weapons or will they develop their own programs? Conversely, sanctions relief will strengthen their economy as well as their military and nefarious activities. When they become only ‘a decision away’ from quickly developing many nuclear weapons, we may have to face that strengthened regime. This is too significant a probability to tolerate.</td>
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<td>The sanctions regime successfully weakened Iran’s economy, an outcome that was achieved only through international unity and cooperation on sanctions enforcement.</td>
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<td>The JCPOA focuses on verifiably cutting off all pathways to an Iranian nuclear weapons program. The President has emphasized enhanced security collaboration with friends and allies, including Israel and Gulf states, to confront Iranian support for terrorism (e.g., Hezbollah) and regional instability (e.g.,</td>
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DNI Clapper stated that while the US can never have 100% certitude, the intelligence community will gain much greater visibility into the Iranian nuclear program with the JCPOA.

The hard-won international unity exhibited in the negotiations by the P5+1 and EU, and in applying sanctions by a large community of nations, will not be disrupted, providing confidence in a strong unified response should Iran contravene these agreements.

If we do not endorse this deal, many global players would shy away from doing business with Iran due to the uncertain environment that would be created.

We may lose unity but we need to do what is right and we have the upper hand in the morality issue – Iran cannot be trusted to be just a decision away from becoming a nuclear weapons state – not now and not in 15 years. If we do not endorse this deal, many global players would shy away from doing business with Iran due to the uncertain environment that would be created.

Intelligence is crucial but not infallible and the stakes are very high. More intelligence will help and so would strengthening this deal. We do not have to rush into an agreement that contains so many flaws. If the agreement is voted down at this time we can examine all options and the possibility of strengthening it unilaterally with Congressional action or even with our allies, if possible.
Yemen) with confidence that Iran does not have a nuclear weapon.

and verification requirements imposed by the JCPOA – the worst of all worlds.

- less than 12 month breakout possible, as discussed, due to 20% uranium and reinstalled IR-2s.

One cannot make the case that all pathways to nuclear weapons are blocked. In addition, as time passes our allies (or the US) will be 'confronting' a stronger and more confident Iran who could choose to breakout or to just wait until they have an industrial sized centrifuge infrastructure and a huge capacity to quickly produce as much HEU as they need at will.