

DOCKET NUMBER **PR 73 & 74**  
PROPOSED RULE  
(57 FR 49656)

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Secretary of the Commission  
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Washington, D. C. 20555

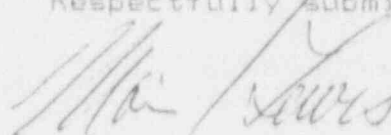
Dear Mr. Secretary:

Please accept this letter as my comments on the Proposed Rule 10 CFR Parts 73 and 74 (RIN 3150-AE27 FR Notice 11-3-92.)

Licensee announcements of safeguards inspections have been a farce. The so-called unannounced inspections were known on a regular basis to operator management well before the inspection. I was told that unannounced inspections were communicated to operator management 24 hours before the inspection. Whether this is in technical violation of 10 CFR 50.70(b) (4), I really don't know. The ipso's and mendacious wording of the background document seems to say that we will continue as we have with just the patina of truthfulness. The rule seems to suggest that arrival or impending inspection may be communicated or announced as long as the licensee is not directly involved in the announcement or communication.

A more effective rule is that the inspection must not be communicated or announced by anyone or the licensee is in violation of the rule.

Respectfully submitted,



11-25-92

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