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Secretary Of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC
20555
Attention: Docketing and Service Branch

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

RE:SUGGESTIONS ON ADVANCED NOTICE OF PROPOSED RULE MAKING

"Financial responsibility requirements applicable to NRC licensees for cleanup of accidental and unexpected releases of radioactive materials."

Gentlemen:

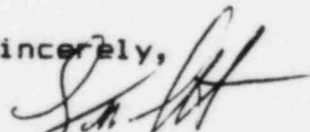
In my opinion the proposed rule is an excellent idea as far as it goes.

I would propose that a pool be established by requiring each licensee contribute an initial amount based on the scope and likelihood of the release of radioactive materials. This amount would vary for each licensee depending on the safety record, items of non-compliance or concern, amount of material historically released, status of radiation safety program, potential for harm.etc etc. Points reducing this amount could be obtained by a rating system evaluating the relative safety of each site to be determined by inspection. Thus the amount contributed to the fund would be tied into the efficiency of the radiation safety program at each facility. This would provide incentive for improving safety programs.

Since the total number each year of accidental releases requiring large expenditures for clean up must be rather small the amount necessary from each licensee should be relatively small as well, but enough to cover the cost of anticipated clean ups based on historic data, and should be much less than the amount that would be required from each licensee if they needed to show financial responsibility on an individual basis.

The unused portion of the fund could be invested in an interest earning account to offset the rise of yearly clean up costs or perhaps funding of public education with regard to ionizing radiation.

Sincerely,



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Acknowledged by card

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