



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

APR 17 1985

PDR-016

Mr. Daniel Hirsch, Director
Adlai E. Stevenson Program on
Nuclear Policy
University of California
Santa Cruz, CA 95064

IN RESPONSE REFER
TO FOIA-84-784

Dear Mr. Hirsch:

This is in final response to your letter dated September 30, 1984, in which you requested, pursuant to the Freedom of Information Act (FOIA), four categories of records related to the proposed rule to reduce the use of Highly Enriched Uranium at Research and Test Reactors. The documents identified on the enclosed appendices are subject to categories 1, 2 and 3 of your request.

The documents identified on Appendix E are being placed in the NRC Public Document Room (PDR) located at 1717 H Street, NW, Washington, DC 20555, in file folder FOIA-84-784 in your name. The documents identified on Appendix F are already in the PDR. I have indicated the file location beside each document description.

The documents identified on Appendix G are being withheld in part, and the documents identified on Appendix H are being withheld in their entirety. The documents contain the predecisional analyses, opinions and recommendations of the Commissioners, and between the Commissioners and their staffs, on the proposed rule for limiting the use of Highly Enriched Uranium (HEU) at research and test reactors. Because the documents reflect the predecisional process among the Commissioners, and between the Commissioners and their staffs, the documents are exempt from mandatory disclosure pursuant to Exemption 5 of the FOIA, 5 U.S.C. §552(b)(5), and the Commission's regulations, 10 CFR §9.5(a)(5). Release of the documents would tend to inhibit the open and frank exchange of ideas essential to the deliberative process. The releasable portions of the documents identified on Appendix G are being placed in the PDR. The documents identified on Appendix H do not contain any reasonably segregable factual portions and are being withheld in their entirety.

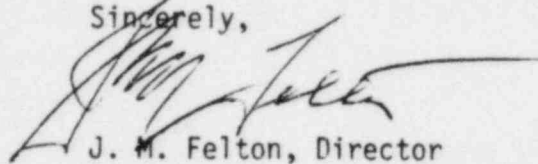
Pursuant to 10 CFR 9.15 of the Commission's regulations, it has been determined that the information withheld is exempt from production or disclosure and that its production or disclosure is contrary to the public interest. The person responsible for the denial of documents 2 and 5 of Appendix G is John E. Zerbe, Director, Office of Policy Evaluation. The person responsible for the denial of document 12 of Appendix G is Carlton Kammerer, Director, Office of Congressional Affairs. The person responsible for the remainder of the denials is John C. Hoyle, Assistant Secretary of the Commission.

B507150041 850417
PDR FOIA PDR
HIRSCHB4-784

These denials may be appealed to the Commission within 30 days from the receipt of this letter. Any such appeal must be in writing, addressed to the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and should clearly state on the envelope and in the letter that it is an "Appeal from an Initial FOIA Decision."

The review of two remaining documents that are subject to your request is continuing. We will notify you upon completion of the review.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. M. Felton", is written over the typed name.

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosures: As stated

APPENDIX E

Documents Being Placed in the PDR

1. Undated Note from T. Rehm to B. LaHS and B. Bernero, Re: Draft Proposed Rule (1 page)
2. Undated Letter to N.J. Palladino from W.J. Richards, w/attachments (5 pages)
3. 06/21/83 Memo to William J. Dircks from Samuel J. Chilk, Re: PROPOSED COMMISSION POLICY TO REDUCE ENRICHMENT AT DOMESTIC RESEARCH REACTORS. (2 pages)
4. 01/31/84 Memorandum for the record, from Samuel J. Chilk, Subject: STAFF REQUIREMENTS - COMMENTS ON IMPLICATIONS OF A PROPOSED RULE REGARDING USE OF HEU IN DOMESTIC RESEARCH REACTORS, 11:15 a.m., FRIDAY, JANUARY 27, 1984, COMMISSIONERS' CONFERENCE ROOM, D.C. OFFICE (OPEN TO PUBLIC ATTENDANCE). (1 Page)
5. 01/31/84 Memorandum for the record from Samuel J. Chilk, Subject: STAFF REQUIREMENTS - DISCUSSION OF INTERNATIONAL IMPLICATIONS OF CONVERSION OF DOMESTIC RESEARCH REACTORS TO LEU USE, 2:00 p.m., FRIDAY, JANUARY 27, 1984, CHAIRMAN'S CONFERENCE ROOM, D.C. OFFICE (PORTION CLOSED--EX. 1). (1 Page)
6. 01/31/84 Memorandum for the record from Samuel J. Chilk, Subject: STAFF REQUIREMENTS - DISCUSSION OF INTERNATIONAL IMPLICATIONS OF CONVERSION OF DOMESTIC RESEARCH REACTORS TO LEU USE, 2:00 p.m., FRIDAY, JANUARY 27, 1984, COMMISSIONERS' CONFERENCE ROOM, D.C. OFFICE (PORTION OPEN TO PUBLIC ATTENDANCE). (1 page)
7. 02/01/84 Note to Chairman Palladino from W.J. Dircks, Subject: DRAFT GUIDANCE FOR FEBRUARY 6, 1984 COMMISSION MEETING, w/attachments. (4 Pages)
8. 02/03/84 Note to Samuel J. Chilk from T.A. Rehm, Subject: PROPOSED RULE ON HEU, w/attachments. (4 Pages)
9. 02/06/84 Memorandum for Commissioner Gilinsky from Samuel J. Chilk, Subject: DISCUSSION OF LEU/HEU GUIDANCE, 3:00 p.m., MONDAY, FEBRUARY 6, 1984 (OPEN). (1 Page)
10. 02/07/84 Letter to Nunzio J. Palladino from Lincoln Clark, Jr., w/attachments. (5 Pages)

APPENDIX E
(Continued)

11. 02/07/84 Memorandum for the record from Samuel J. Chilk, Subject: STAFF REQUIREMENTS - DISCUSSION OF PHYSICAL SECURITY AT DOMESTIC RESEARCH REACTORS, 1:30 p.m., MONDAY, FEBRUARY 6, 1984, CHAIRMAN'S CONFERENCE ROOM (CLOSED--EX.1). (1 Page)
12. 02/07/84 Memorandum for John E. Zerbe from Samuel J. Chilk, Subject: STAFF REQUIREMENTS - DISCUSSION OF LEU/HEU GUIDANCE, 3:00 p.m., MONDAY, FEBRUARY 6, 1984, COMMISSIONERS' CONFERENCE ROOM, D.C. OFFICE (OPEN TO PUBLIC ATTENDANCE). (1 Page)
13. 02/10/84 Note to Commissioner Asselstine from R.J. Brady, w/attachments. (8 Pages)
14. 02/29/84 Letter to Professor Otto K. Harling from Frederick M. Bernthal. (1 Page)
15. 03/23/84 Letter to Nunzio Palladino from Rep. Harold L. Volkmer, w/attachment. (2 Pages)
16. 04/09/84 Letter to Honorable Alan Simpson, from Nunzio J. Palladino, w/attachments. (5 Pages)
17. 04/10/84 Note to Bill Dircks from Vic Stello, Re: PROPOSED RULE FOR LIMITING THE USE OF HEU IN RESEARCH REACTORS. (1 Page)
18. 06/08/84 Notation Vote, Response Sheet to Samuel J. Chilk for Commissioner Gilinsky. (1 Page)
19. 06/11/84 Notation Vote Response Sheet to Samuel J. Chilk from Commissioner Asselstine. (1 Page)
20. 06/12/84 Letter to John C. McKinley from Donald E. Feltz. (1 Page)
21. 06/12/84 Notation Vote Response Sheet to Samuel J. Chilk from Commissioner Roberts. (1 Page)
22. 06/14/84 Notation Vote Response Sheet to Samuel J. Chilk from Commissioner Bernthal. (1 Page)
23. 06/19/84 Letter to James K. Asselstine from Harold M. Agnew w/appendix. (4 Pages)
24. 06/26/84 Notation Vote Response Sheet to Samuel J. Chilk from Commissioner Asselstine. (1 Page)
25. 07/24/84 Routing slip to Carl Withee from Sarah Wigginton w/attachments. (3 Pages)

APPENDIX E
(Continued)

26. 08/09/84 Memo to Chairman Palladino and Commrs., Roberts, Asselstine, Bernthal and Zech from Carlton Kammerer, Subject: LLOYD SUBCOMMITTEE TO HOLD HEARING ON HEU/LEU FUEL CONVERSION, w/attachments. (6 Pages)
27. 08/21/84 Letter to James K. Asselstine from Walter F. Wegst, w/attachments. (3 Pages)
28. 09/07/84 Letter to Dr. Thomas H. Pigford from James K. Asselstine. (1 Page)
29. 09/05/84 Letter to Nunzio J. Palladino from Lincoln Clark, Jr.. (2 Pages)
30. 09/05/84 Letter to Nunzio J. Palladino from Marilyn Lloyd. (1 Page)
31. 09/07/84 Notation Vote Response sheet to Samuel J. Chilk from Commissioner Asselstine. (1 Page)
32. 09/18/84 Memorandum for Chairman Palladino and Cmmrs., Roberts, Asselstine, Bernthal and Zech, Subject: UPCOMING LLOYD HEARING ON HEU/LEU FUEL CONVERSION, w/attachments. (4 Pages)
33. 09/13/84 Letter to Walter F. Wegst from Frederick Bernthal. (1 Page)
34. 09/24/84 Memo to Chairman Palladino and Cmmrs. Roberts, Asselstine, Bernthal and Zech from Carlton Kammerer, Subject: TESTIMONY FOR LLOYD/FUQUA HEARING ON HEU CONVERSION w/attachments. (7 Pages)
35. 09/28/84 Memo to Chairman Palladino and Cmmrs., Roberts, Asselstine, Bernthal and Zech, Subject: LLOYD/FUQUA HEARING ON HEU/LEU FUEL CONVERSION w/attachments. (4 Pages)

APPENDIX F
Documents Already in PDR

1. 03/01/83 Memo from John Zerbe to Comm. Ahearne, Re: Policy to Reduce Enrichment of Domestic Research and Test Reactors. Accession No. 8304070406
2. 01/27/84 Commission Mtg. Transcript: International Implications of Conversion of Domestic Research Reactors to HEU Use-2:00 p. Accession No. 842150464
3. 01/27/84 Commission Mtg. Transcript: Comments on Implications of a Proposed Rule Re: Use of HEU in Domestic Research Reactors - 11:15 a. Accession No. 840209112
4. 03/01/83 Memo from S.J. Chilk to the Record-Staff Requirements from Comm. Mtg.-Comments on Implications of a Proposed Rule Regarding Use of HEU in Domestic Research Reactors, 11:15 a., Jan. 27, 1984, Accession No. 8402060481
5. 01/31/84 Memo from S.J. Chilk to the Record - Staff Requirements from Comm. Mtg.- Discussion of International Implications of Conversion of Domestic Research Reactors to HEU Use, 2:00 p. Jan. 27, 1984. Accession No. 8402130537
6. 05/30/84 SECY-84-220-Research Reactor Fuel Conversion Developments and Related Issues, Accession No. 8406110093
7. 06/11/84 Memo from S.J. Chilk to W.J. Dircks-Staff Requirements from Commission Mtg.-Discussion/Possible Vote on Proposed Rule on LEU/HEU Fuel, 2:00 p., May 31, 1984. Accession No. 8406190532
8. 06/14/84 Letter from C.E. Young, UCLA, to Palladino re plans to withdraw license. Accession No. 8406250315
9. 06/14/84 Letter from C.E. Young, UCLA, to Palladino Re: Notification of plans to withdraw UCLA license and intention to decommission. Accession No. 8406180395
10. 06/22/84 Letter from Joseph Talnagi to Palladino, Accession No. 8410050157

APPENDIX G
Documents Being Withheld in Part

1. 01/25/84 Memo from W.J. Dircks to the Commission Subject: High Enriched Uranium at Nonpower Reactors. (4 pages)
2. 01/31/84 Memo from John Zerbe to the Commission, subject: Reducing Fuel Enrichment and Upgrading Physical Protection at Non-Power Reactors. (2 pages)
3. 02/01/84 Memo for the Record from S.J. Chilk subject: Staff Requirements-Briefing on Possible Uses of Special Nuclear Material Available in the Non-Power Reactor Community, 9:30 a.m., Friday, January 27, 1984, Chairman's Conference Room, DC Office (Closed--EX1). (1 page)
4. 02/03/84 Memo from W.J. Dircks to the Commission, subject: High Enriched Uranium at Nonpower Reactors. (1 page)
5. 02/08/84 Memo from John Zerbe to the Commission, Subject: Proposed Draft Requirements Memorandum to Staff Regarding Non-Power Reactors. (3 pages)
6. 03/27/84 Memo from W.J. Dircks to the Commission, Subject: Response to Senator Simpson's Letter Dated March 18, 1984. (6 pages)
7. 06/07/84 Memo from W.J. Dircks to the Commission, subject: Inspection of the Self Protecting Exemption. (1 page)
8. 06/20/84 Memo from S.J. Chilk to W. Dircks, C. Kammerer, and J. Fouchard, Subject: SECY-84-211-Proposed Rule for Limiting The Use of High-Enriched Uranium (HEU) in Research and Test Reactors. (1 page)
9. 06/28/84 Memo from S.J. Chilk to W. Dircks, C. Kammerer and J. Fouchard, Subject: SECY-84-211-Proposed Rule for Limiting the Use of High-Enriched Uranium (HEU) in Research and Test Reactors. (1 page)
10. 08/23/84 SECY-84-336 "Funding for DOE's Reduced Enrichment for Research and Test Reactors Program." (2 pages)
11. 08/30/84 Memo from Dan Garner to Tom Rehm, subject: SECY-84-336-Funding of RERTR Program. (1 page)
12. 09/10/84 Memo from C. Kammerer to the Commission, subject: Draft Testimony for Lloyd/Fuqua Hearing on HEU Conversion.

APPENDIX H
Documents Being Withheld in Their Entirety

1. 01/25/84 Memo from L. Stoloff to Commissioner Bernthal containing background information for 1/27 public Commission meeting. (2 pages)
2. 02/02/84 Memo from S. Trubatch, OGC, to Cmr. Legal Assts., "Development of Proposed Rule on HEU at Domestic Research Reactors and Interim Security Measures." (1 page)
3. 02/09/84 Memo from J.A. Fitzgerald, OGC, to Cmr., "Proposed Draft Requirements Memorandum to Staff Regarding Non-Power Reactors--OGC Amendment." (1 page)
4. 02/21/84 Vote sheet of Chairman Palladino on CR-84-11, with markup of draft response. (3 pages)
5. 02/23/84 3 Annotated copies of the memo from Chilk to Dircks, subject: Development of a Proposed Rule on the Use of HEU and Steps to Improve Security Measures (12 pages) (Memo is already available in the PDR)
6. 02/24/84 Vote sheet of Cmr. Asselstine on CR-84-11, with markup of draft response. (1 page)
7. 02/27/84 Vote sheet of Cmr. Roberts on CR-84-11, with markup of draft response. (1 page)
8. 02/28/84 Vote sheet of Cmr. Bernthal on CR-84-11, with markup of draft response. (1 page)
9. 02/29/84 Vote sheet of Cmr. Gilinsky on CR-84-11, "Proposed Letters to Reps. Ottinger, Markey and Wolpe responding to January 26 comments on Commission consideration of conversion of research and test reactors from HEU to LEU" with markup of draft response. (2 pages)
10. 03/09/84 Memo from Cmr. Gilinsky to J. Funches, NRR, "National Research Council Contract." (1 page)
11. 03/09/84 HEU/LEU Conversion Statistics, L. Stoloff notes, (3 pages)

APPENDIX H

(Continued)

12. 04/09/84 Concurrence copy of letter from N.J. Palladino to Senator Alan Simpson (1 page) [Final letter is already in the PDR]
13. 04/08/84 Draft letter to Senator Alan Simpson re: proposed rule on HEU to LEU conversions with marginal notation of Chairman Palladino.
14. 06/05/84 Chairman Palladino's vote sheet on SECY-84-211, "Proposed Rule for Limiting the Use of High-Enriched Uranium (HEU) in Research and Test Reactors." (8 pages)
15. 09/19/84 Memo from L. Stoloff to Commissioner Bernthal on Redraft of HEU Conversion Testimony. (1 page)
16. 09/20/84 Memo from K. Cohen to Commissioner Bernthal and L. Stoloff on reasons for reduced numbers of HEU exports. (1 page)
17. 09/25/84 Summary of Proposed Rule, note by L. Stoloff. (1 page)
18. 10/24/84 Signed Memo from S.J. Chilk to W.J. Dircks, "SECY-84-336 - Funding for DOE's Reduced Enrichment for Research and Test Reactors Programs." (1 page)
19. 10/24/84 Draft memo from S.J. Chilk to W.J. Dircks, "SECY-84-336 - Funding for DOE's Reduced Enrichment for Research and Test Reactors Program" with handwritten notations at end of text. (1 page)
20. 10/24/84 Draft memo from S.J. Chilk to W.J. Dircks, "SECY-84-336 - Funding for DOE's Reduced Enrichment for Research and Test Reactors Program" with handwritten notation in upper right hand corner. (1 page)
21. Undated Vote sheet of Office of Congressional Affairs on CR-84-11. (1 page)
22. Undated Draft letter to Senator Alan Simpson re: proposed rule on HEU to LEU conversions with marginal notations depicting votes of Chairman Palladino and Commissioners Gilinsky, Roberts, Asselstine, and Bernthal.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

June 18, 1984

Honorable Nunzio J. Palladino
Chairman
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Palladino:

SUBJECT: ACRS REPORT ON PROPOSED RULE FOR LIMITING THE USE OF HIGHLY
ENRICHED URANIUM IN DOMESTIC RESEARCH AND TEST REACTORS

During its 290th meeting, June 14-16, 1984, the Advisory Committee on Reactor Safeguards reviewed a proposed rule for limiting the use of highly enriched uranium in research and test reactors and a plan to increase security measures at nonpower reactors that use high-enrichment fuel. These matters were considered also during a Subcommittee meeting in Washington, D.C. on June 12, 1984. During our review, we had the benefit of discussions with representatives of the NRC Staff, affected users, and advocates of reduced availability of highly enriched uranium fuel. We also had the benefit of the documents referenced.

With regard to the proposed rule limiting the use of highly enriched uranium in domestic research and test reactors (contained in SECY-84-211), we believe it would be more appropriate to base the proposal on national policy as articulated in the Nuclear Nonproliferation Policy Act of 1978 than to try to tie it to an unidentified threat. If the proposal is based on national policy, it would be appropriate for the government to pay the costs of conversion from high-enrichment (HEU) to low-enrichment uranium fuel (LEU), including such costs as the licensees may incur to accomplish the conversion. The conversion should be made in a gradual and orderly manner as funds and fuels become available. The rule should provide the licensees with the option of conversion to LEU or retaining HEU and meeting appropriate security requirements.

If, as a consequence of changes needed to effect a conversion, a license amendment is required, then a hearing with the opportunity for public intervention is possible. Before the Commission adopts a rule which might permit unrestricted intervention, we recommend that the Commission obtain an evaluation of the course, nature, costs, and other relevant aspects of previous contested hearings involving nonpower reactors to determine if the hearings are serving their intended function effectively. It may be that the rules regarding hearings involving low power research reactors should be different than those for power reactors.

~~0146234359~~ X11 3pp.

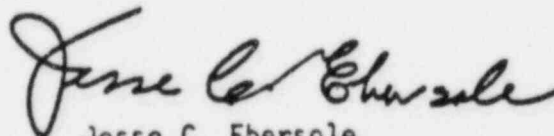
June 18, 1984

The exceptions in the proposed rule which would permit special purpose reactors to continue to use highly enriched uranium fuel are appropriate and should be retained.

With regard to the plan and schedule to increase security measures at nonpower reactors that use highly enriched uranium fuel, we find no objections to the proposals. We see no need to proceed on an expedited schedule.

Two of the Committee members who participated in this review are associated with affected institutions listed in the draft public announcement of this rule. Because they are rendering advice of a general nature from which their employers will gain no preference over others, they are not required to refrain from participating in this matter. Dr. M. W. Carbon did not participate in this review.

Sincerely,



Jesse C. Ebersole
Chairman

References:

1. Rulemaking Issue (SECY-84-211) from William J. Dircks to the Commissioners, Subject: Proposed Rule for Limiting the Use of High-Enriched Uranium in Research and Test Reactors, dated May 22, 1984
2. Rulemaking Issue (SECY-84-216) from William J. Dircks to the Commissioners, Subject: Security Measures at Nonpower Reactors, dated May 25, 1984
3. Policy Issue (SECY-84-220) from William J. Dircks for the Commissioners, Subject: Research Reactor Fuel Conversion Developments and Related Issues, dated May 30, 1984
4. Report to NRC Commissioners, "Weapons-Grade Uranium on Campus - The Need to Convert Research Reactors to Lower Enrichment Fuels," by Daniel Hirsch, Stevenson Programs on Nuclear Policy, University of California, Santa Cruz, dated January 27, 1984
- ✓ 5. Letter from Donald E. Feltz, Nuclear Science Center, Texas A&M University System, to John C. McKinley, Advisory Committee on Reactor Safeguards, dated June 12, 1984, Subject: ACRS meeting of June 12, 1984 regarding proposed rule on HEU
- ✓ 6. Letter from James J. McGovern, Business Manager, Radiochemicals, Union Carbide Corporation to U. S. Nuclear Regulatory Commission, Subject: Issue of HEU to LEU conversion of research reactor fuel, dated June 12, 1984
- ✓ 7. Report by Edwin L. Zebroski, Energy Study Center, Electric Power Research Institute, "Relative Diversion Exposures of High Enrichment

Uranium: Relation to University Research Reactors," dated June 4, 1984

- ✓ 8. Statement of William R. Mowry, License Administrator, GA Technologies, Inc. before the ACRS Subcommittee on Safeguards and Security dated June 12, 1984
- 9. Statement of Dr. David W. Hafemeister Before the NRC Regarding the Need to Convert Domestic Research Reactors from Highly Enriched to Low-Enriched Uranium Fuels, dated June 12, 1984
- 10. Statement of Paul L. Leventhal, Nuclear Control Institute, Before the Subcommittee on Safeguards and Security, ACRS, Regarding the Need to Convert Domestic Research Reactors From Highly Enriched to Low-Enriched Uranium Fuels, dated June 12, 1984

UNIVERSITY OF CALIFORNIA, SANTA CRUZ

BERKELEY • DAVIS • IRVINE • LOS ANGELES • RIVERSIDE • SAN DIEGO • SAN FRANCISCO



SANTA BARBARA • SANTA CRUZ

ADLAI E. STEVENSON COLLEGE

SANTA CRUZ, CALIFORNIA 95064

September 30, 1984

Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FOIA Request

FREEDOM OF INFORMATION
ACT REQUEST

FOIA 84-784

Rec'd 10-4-84

Dear Director Felton:

This is a request under the Freedom of Information Act,
as amended.

I hereby request the following documents related to a
proposed rule to reduce the use of Highly Enriched Uranium (HEU)
at research and test reactors:

(1) all written communications from January 30, 1984, to
the present related to the above subject between non-NRC
individuals (e.g., representatives of research reactor
operators or the nuclear industry) and (a) the NRC
Commissioners, (b) the Commissioners' immediate staffs,
and (c) other members of the NRC Staff.

(2) all records for the same period of meetings and phone
conversations between non-NRC individuals and the
individuals identified in (a), (b), and (c) above related
to the HEU conversion issue.

(3) all memoranda, correspondence, and other written
communications, including SECY documents, between
members of the NRC Staff, and between the NRC Staff and
the Commissioners, for the same period as to the HEU
conversion matter.

(4) the transcript of the meeting of the ACRS Subcommittee
on Safeguards on June 12, 1984, in which the HEU conversion
issue was discussed, as well as references 5-8 of the ACRS
letter of June 18, 1984 (attached), as well as the
transcript of that portion of the ACRS full meeting on
June 15, 1984, in which the HEU matter was discussed.

~~85954448~~ 2pp.

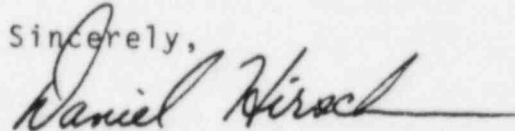
J.M. Felton
September 30, 1984
Page 2

SECY-84-211,216, and 220 need not be provided. ;

The material is requested on behalf of a research project of the Stevenson Program on Nuclear Policy at UCSC, a not-for-profit research center working on, among other things, a review of the policy implications of the proposed HEU conversion rule. The results of the study, relying in part on the materials requested, will be used in preparation of detailed comments on the proposed rule, Congressional testimony, and publication, contributing to the public debate on this matter and providing factual and analytic insights of value to the NRC and Congress as they consider the implications of going forward with the long-standing HEU conversion policy or reversing it. For these reasons, I request waiver of search and copying fees, because the material will primarily benefit the public.

I look forward to your prompt response to this request, as the comment period for the proposed rule expires in early November. If you have any questions, please do not hesitate to call at (408) 429-2833, -2555 (messages), 336-5381 (home).

Sincerely,



Daniel Hirsch
Director
Adlai E. Stevenson Program
on Nuclear Policy

enclosure: ACRS letter of 6/18/84

P.S. This request does not address public comments on the proposed HEU conversion rule directed to the Secretary of the Commission in response to the Federal Register solicitation of public comment and already placed in the PDR.