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NUCLEAR REGULATORY COMMISSION
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NOTE TO: Secretary of the Commission
Nuclear Regulatory Commission
Attention: Docketing and Service Branch

FROM: G. E. Edison, Chief
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SUBJECT: COMMENTS ON PROPOSED AMENDMENTS TO PART 140

The purpose of this note is to provide a comment on the proposed amendment to Part 140 (Revision of Criteria for Extraordinary Nuclear Occurrence).

Comment

I do not believe the Commission's regulations should specify limits that are undefined and which are continually changing. Specifically, in this particular proposed change, any damage limit specified in terms of dollars should define those dollars in such a way that they have the same meaning several years from now as they do today. Are they 1960 dollars, 1985 dollars or 1995 dollars? There is a very significant difference.

I recommend the Commission either (a) delete the use of a changing and undefined unit of measure, such as dollars, from its regulations, or (b) define the unit of measure uniquely so that it is not changing.

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