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DOCKET NUMBER  
PROPOSED RULE **PR 30-32 et al.**  
(61 FR 51835)

DOCKETED  
USNRC

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
October 11, 1996

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-001  
ATTN: Docketing and Service Branch

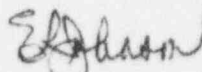
Dear Sir:

Please refer to Proposed Rule dated September 30, 1996 regarding "Deliberate Misconduct by Unlicensed Persons".

I propose that the aforementioned rule be extended to persons that deliberately submit information that the person submitting the information knows to be incomplete or inaccurate in some respect material to NRC under the provisions of 10CFR21 (Reporting of Defects and Non Compliance). It is highly discriminatory to subject persons that submit knowingly incomplete or erroneous information to licensees to the penalties provided by the proposed rule -- and not those that submit knowingly incomplete or erroneous information to NRC regarding defects or non-compliance under 10CFR21. The latter also has a material public safety significance inasmuch as it misdirects valuable resources of both the NRC and its licensees, without justification, to addressing the allegation of defects or non-compliance when such resources would otherwise be available to ensure safe operations and to address real safety issues. This extension of the proposed rule should not deter persons that identify real safety problems from reporting them to the NRC, that were either founded in fact or represented the honest belief that they existed, but would serve as a deterrent to deliberate and willful misrepresentations -- made as a result of employee or contractor disgruntlement, labor disputes, and the like.

Your careful consideration of these comments is respectfully requested.

Very truly yours,



E. R. Johnson

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