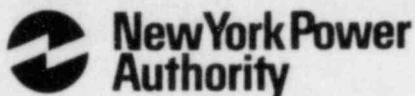


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(50 FR 19695) (19)

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'85 JUL 22 AM 54

Memorandum

July 16, 1985
JCB-85-069

OFFICE OF SERVICE
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk, Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attention: Docketing and Service Branch

Dear Mr. Chilk:

Subject: NRC Proposed Rule on
Material Balance Reports
(50 FR 19695)

The New York Power Authority takes this opportunity to comment on the subject item which was published on May 10, 1985. The Power Authority is not in favor of the proposed rule for the following reasons:

*Contrary to the NRC stated goal of reducing inventory reporting, it is the Authority's position that the proposal will increase utility workload in special nuclear material inventory reporting. In the present system of reporting, the calculations which support generation of DOE/NRC Form 742C, Physical Inventory Listing, lead directly to the quantities of SMN reported on DOE/NRC Form 742, Material Balance Report. In the proposed system, a separate group of calculations will be required to verify the NRC generated report since the Commission will not have burn-up and production figures for the applicable reporting period at the time the NRC report is generated. If the NRC provides the utility with the DOE/NRC Form 741 utilized in generating this report, it will be relatively easy for the utility to perform this verification. If this is not the case however, the verification may be considerably complicated especially if the utility is in a period during which it is receiving or shipping fuel, and transmitting several sets of 741 forms over a short span of time.

*If the Commission's stated goal of reducing licensee paperwork in this area is asserted, the Authority suggests the Commission consider eliminating the redundancy between the 742 and the 742C forms.

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add: Gene Robertson, 88155
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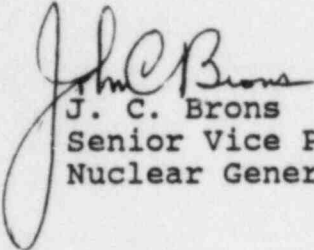
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ACKNOWLEDGED BY CARD JUL 23 1985

In the alternate if the proposed rule cannot be eliminated, the time allowed for response should be lengthened. The utilities presently have 30 days to generate SMN inventories (working from data utilities process inhouse). The proposed rule gives the utility 15 days, or less, depending on the mails. If the utility is in a plant startup, scheduling time to complete the report could be difficult. This report is not of such critical value that a longer response time would be of any consequence.

If you have any questions on our comments or if we can be of further assistance, please do not hesitate to contact us.

Very truly yours,


J. C. Brons
Senior Vice President
Nuclear Generation