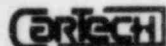


CARPENTER TECHNOLOGY CORPORATION
FINANCIAL DEPARTMENT

P.O. BOX 662, READING, PENNSYLVANIA 19603 (215) 371-2000



'85 SEP 25 A10:28

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

September 19, 1985

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Financial Responsibility Requirements

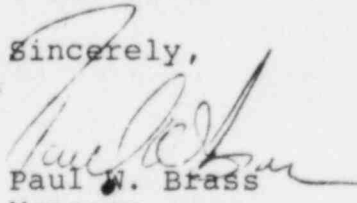
Gentlemen:

Under "Need for Action" you say "...the NRC staff believes most of these licensees already have some financial resources or insurance coverage for on-site and off-site cleanup as a prudent business practice." It is our belief that your assumption regarding insurance is groundless. One of the most common exclusions in all insurance policies relates to bodily injury as property damage due to the nuclear hazard.

Additionally, you fail to demonstrate a need. In all the years nuclear materials have been used, you have only found one case where the company responsible was financially unable to pay for cleanup. You admit you will incur substantial logistical effort and cost and can only speculate that it might be of some future benefit even though there has been no need to date.

"If it ain't broke, don't fix it."

Sincerely,


Paul W. Brass
Manager
Insurance & Risk Management

8509300291 850919
PDR PR
30 50FR23960 PDR

PWB:bls

DS10
add Mary Jo Surman, 62355
Wm. Elmstead, 9604 MNB
1/0

SEP 25 1985

Acknowledged by card.....