



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

PDR  
OK

14 1985

Ms. Christine Hudgins  
McGraw-Hill Publications Company  
1120 Vermont Avenue, NW - Suite 1200  
Washington, DC 20005

IN RESPONSE REFER  
TO FOIA-85-294

Dear Ms. Hudgins:

This is in response to your letter dated April 18, 1985, in which you requested, pursuant to the Freedom of Information Act (FOIA), all records related to disclosures and responses to disclosures made by International Energy Associates Ltd. (IEAL) for 1984 and 1985 on potential conflicts in accepting NRC contracts or continuing work on those contracts.

The documents listed on the enclosed appendix are responsive to your request.

Document one is a one-page memorandum regarding the Conflict of Interest (COI) Analysis on IEAL's Unsolicited Proposal, with attached portions of the IEAL proposal. Pages five through eight of this proposal are those pages subject to your request. The remaining portion of this proposal falls outside the scope of your request and, therefore, is not being provided. This document is being placed at the NRC's Public Document Room for your inspection and copying in file folder FOIA-85-299 in your name.

Document two is a one-page memorandum, an attorney work product, that is being withheld in its entirety from public disclosure pursuant to Exemption (5) of the FOIA (5 U.S.C. 552(b)(5)) and 10 CFR 9.5(a)(5). There are no reasonably segregable factual portions.

Pursuant to 10 CFR 9.15 of the NRC'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 document two is Mr. Guy H. Cunningham, Executive Legal Director.

This denial 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."

Sincerely,

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

Enclosure: As stated

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Re: FOIA-85-294

APPENDIX

1. 06/29/84 Memorandum for Hudson Ragan from Alois J. Burda, subject: "Conflict of Interest (COI) Analysis on IEAL Unsolicited Proposal," (1 page) transmitting pages five through eight of subject proposal (4 pages)
2. 07/10/84 Note to Alois J. Burda from Ralph E. Avery, subject: Conflict of Interest Analysis on IEAL Unsolicited Proposal (1 page)