



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

AB46-1  
PDR

FEB 5 1985

MEMORANDUM FOR: Priscilla Dwyer  
Office of Nuclear Material Safety & Safeguards

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

SUBJECT: DRR REVIEW OF PROPOSED REVISIONS TO 10 CFR PARTS 70  
AND 73, CHANGES TO SAFEGUARDS REPORTING REQUIREMENTS

This Division of Rules and Records (DRR) has reviewed the above proposed rule-making, revised to respond to CRGR comments, and concurs, based on your compliance with the comments in paragraphs two and three below and your consideration of our remaining comments. A DRR-marked copy is enclosed for your information.

On page 4 of the Federal Register notice (FRN), paragraph one mentions that the rulemaking is responsive to a portion of a petition for rulemaking (PRM) submitted by NUBARG. The discussion regarding the response to PRM-50-36 should be expanded somewhat to include (1) what the petitioner originally wanted and why and (2) a description of how this rulemaking responds to that part of the petitioner's request. A FRN which discusses the resolution of PRM-34-3 is enclosed as an example. Also enclosed is the original PRM-50-36 for your information.

The Regulatory Analysis on page 5 of the FRN has been revised to show the significant savings to the industry and NRC by indicating the current and the proposed figures.

We recommend that you make a cross reference to Appendix A in Part 73 when mentioning the telephonic notification. This will enable the licensee to know quickly where the telephone number for the Emergency Response Center is located.

This is to alert you that where you have made reference to a two-year record retention period (as in §73.71(c)(1)) may be subject to change. As you may know, there is an agency-wide effort to standardize record retention periods. Previously, the acceptable standards were 2, 5, 10 years, or life of plant. Currently, there is an effort underway to revise the lower figure to 3 years. If you decide not to change the figure for the proposed rulemaking, it may be subject to change when this rule is prepared for publication as a final rule.

In addition, we have made other minor corrections and/or comments, as noted in the margins.

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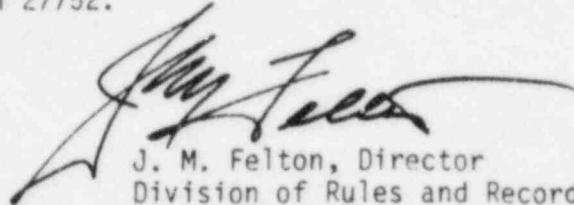
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Priscilla Dwyer

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If you have any questions regarding this review, please contact John Philips, Chief, Rules and Procedures Branch, DRR, ADM, on extension 27086, or Sarah Wigginton of his staff on extension 27752.



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

Enclosures: As stated

cc: Patricia Norry