

RES INDEPENDENT REVIEW BOARDVOTING SHEET

TO: ROBERT M. BERNERO, CHAIRMAN, RIRB

FROM:

TITLE OF RULEMAKING: "REPORTING REQUIREMENTS FOR SAFEGUARDS EVENTS"

☐

AGREE WITH DRAFT RES
INDEPENDENT RECOMMENDATIONS
IN DRAFT INDEPENDENT REVIEW
PACKAGE.

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REQUEST RIRB
MEETING.

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MODIFY DRAFT RES
INDEPENDENT RECOMMENDATIONS
AS INDICATED BELOW.

☐

NOT PARTICIPATING.

COMMENTS AND SUGGESTIONS:

The memorandum from RAMRB, DRAO, RES to RIRB members notes in the summary analysis that the proposed rule "involves a significant question of policy." I do not agree with this characterization. The proposed rule appears to try to accomplish a simplification and clarification of safeguards events notification requirements.

In the proposed "RES Staff Review Summary Sheet," paragraph 2a notes that the rulemaking package does not include the basis for the issue that the present reporting requirements are confusing to the licensees and are difficult to properly implement. The summary sheet further notes that the NMSS contact stated that the missing justification will be sent for review shortly. Nevertheless, the summary sheet indicates in paragraph 3a that "the need for this rulemaking has been established even if it is only to clarify and simplify existing requirements." The summary sheet further notes in paragraph 3b that "if the rulemaking were to proceed on the sole basis of clarification and simplification...it would be well worth the effort." I believe these statements are not consistent.

I agree that sufficient information has been provided for us to recommend that the rulemaking proceed, including the development of the missing justification. But I don't see how we can make statements stating that the need for the rulemaking has been established without this justification.

[Signature]
O. E. Bassett
MEMBER, RIRB

7/7/74

DATE

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