



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

AB46-1  
PDR

MAR 13 1984

MEMORANDUM FOR: Priscilla Dwyer, SGPR  
Division of Safeguards  
Office of Nuclear Material Safety and Safeguards

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

SUBJECT: REVIEW OF PROPOSED RULE AMENDING 10 CFR §73.71

The Division of Rules and Records concurs with the proposed rule, "Changes to Safeguards Reporting Requirements," amending 10 CFR §73.71 subject to the following comments.

A copy of the June 13, 1983, R. Fraley identification of ACRS interest in Part 73 and other proposed rules is enclosed for your information. Should you decide that ACRS review is necessary, a statement on that review should be added to the Commission paper.

Additional information has been added to the summary to more explicitly describe the need for the revision to this section and who would be affected by the amendments.

In the preamble, we have provided the Federal Register citations for previous amendments to this section, a standard statement on compliance with the Paperwork Reduction Act of 1980, and a revised authority citation for 10 CFR Part 73.

The Document Management Branch, TIDC, ADM, has been provided a copy of this rule. Any questions regarding clearance of the information collection requirements in this rule should be directed to that branch (ext. 28585).

About the rule text, language for identical requirements should be the same so that the requirements cannot be construed as different (see §73.71 (a) and (b) and paragraphs (a) and (b) of Appendix G). Further, since Appendix G is intended to describe various safeguards events, the requirements tucked in paragraphs (c) and (d) of the appendix should be moved to §73.71 as indicated. A suggested reorganization and clarification for §73.71 (c) is provided to better separate its three components.

The value/impact statement for this rule is excellent because it is very specific about costs and effort to be expended by both NRC and the industry.

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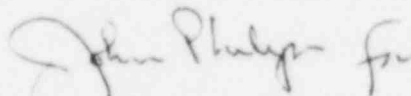
Priscilla Dwyer

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Other minor editorial suggestions and changes to meet the format required for publication in the Federal Register are marked on the enclosed copy.

If you have any questions about our comments, please contact Nita Beeson (27760) of my staff.



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

Enclosures:

1. Proposed Rule Package
2. June 13, 1983, R. Fraley  
Identification of Areas of  
ACRS interest