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August 20, 1985

OFFICE OF SECRETARY
DOCKETING & SERVICE BRANCH
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Docketing and Service Branch

Sir:

We have reviewed "ANPRM on Financial Responsibility for Cleanup of Accidental Releases of Certain Materials Licenses." We concur with the need for such regulation and would make the following points:

The additional paperwork burden for licenses should be kept to a minimum.

Financial requirements should be assessed on a sliding scale accounting for the toxicity, half-life and quantity of the material.

Licenses of small quantities of materials with short half lives and low activity who are found to have a low potential for accidental release should be exempted. The estimated cost of cleaning up a "worst case" accident should be the determining factor.

Thank you for the opportunity to comment on this proposal.

Kerry J. Stiff
Kerry Stiff
Radiation Safety Officer

cc Benito J. Garcia
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Acknowledged by card

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