



PROPOSED RULE PR-Misc Notice  
(NUREG-0956)

DOCKETED

## Nuclear Information and Resource Service

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September 16, 1985

Docketing & Service Branch  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Sir or Madam:

I am writing regarding the public comment period set for NUREG-0956, "Reassessment of the Technical Basis for Estimating Source Term." It is my understanding that the comment period is 90 days from the date of issuance, August 7th. Such a period of time is inadequate.

I am hereby requesting an extension to this comment period from 90 days to 180 days for the following reasons. First, NUREG-0956 was issued in the summer month of August when many people were on vacation. Second, the sheer length of this document merits a longer than usual comment period. NRC routinely publishes proposed rules, much shorter than this NUREG, for which the public may be given several months in which to respond. For example, NRC extended the comment period for the Decommissioning Rulemaking from May to November, 1985, thus allowing a comment period of nearly 9 months.

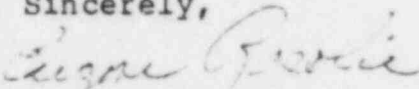
Equally important is the highly technical nature of the document, necessitating far more work than otherwise, and requiring potential commenters to seek out qualified persons to analyze the technical information presented. Fourth, it usually requires several weeks for prospective commenters to become aware and request copies of such documents, thereby decreasing the time available to them to review and comment. For example Federal Register notices often are not available on the West Coast for two to three weeks after publication. Lastly, and perhaps most important, given the major role NUREG-0956 may play in the changing of NRC's regulations, it seems only fair that NRC allow an adequate comment period.

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PDR NUREG  
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D309 add Ross Silbaugh, 113055  
William Alstead, 9604 MHB

In sum, there are many reasons for NRC to extend the comment period for NUREG-0956, and few, if any, reasons not to. I hope the Commission will respond favorably to this request in an effort to seek as much review and public input into its analyses of source term as is possible.

Sincerely,



Eugene Rosolie  
Research Analyst

cc: NRC Commissioners  
D.F. Ross, Jr., NRR