



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

JUN 2 1982

Walker
nothing substantive
in this entire pkg
done
6/9/82

MEMORANDUM FOR: Richard E. Cunningham, Director
Division of Fuel Cycle and Material Safety

FROM: L. I. Cobb, Director
Division of Fuel Facilities, Materials and
Safeguards

SUBJECT: PROPOSED REVISION OF 10 CFR PART 35

We have some reservations regarding the proposed revision of the rule and the justification as it is written.

For example, (1) we question the statement about a reduction in regulatory and administrative burden on the industry in the face of such a prescriptive rule; (2) It seems inconsistent to say that "...safety technology is now fully developed and safety requirements are well defined ...", and then incorporate all these details into the regulations; (3) We don't understand the use of an automated management information system (MIS) as a justification for the rule change.

Other specific comments are noted on the enclosed marked-up copy of the draft revision. We will be glad to meet with you and discuss them at greater length.

L. I. Cobb, Director
Division of Fuel Facilities, Materials
and Safeguards

Enclosure: As stated

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Verbal concurrence from Leo
Higginbotham. An oversight.
6/14/82
WJ Walker

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