DOCKET NUMBER

ROPOSED PULE 18 51,61,70, 72,73,74, 75, 76 Fax (412) 782-0550 (66FR 29251) 101 JUL 11 P3:08

1045 North Canal Street Pittsburgh, PA 15215 (412) 782-4350

July 9, 2001

Secretary U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Attn: Rulemaking and Adjudication Staff

Dear Secretary:

In the Federal Registry dated May 30, 2001 (Volume 66, Number 104) the Nuclear Regulatory Commission proposed an amendment to its material control and accounting (MC&A) regulations. The summary indicates that the change involves the frequency and timing of the reports, clarification of categorical exclusions and revisions for Category II facilities. The stated intent of these changes is to reduce unnecessary burden on licensees and the NRC without adversely affecting public health and safety.

As stated in the proposed rule change certain documents related to this rulemaking, including comments received, may be examined at the NRC's Public Document Room (PDR), 11555 Rockville Pike, Room O-1F12, Rockville, MD. These same document may also be viewed and downloaded electronically via the rulemaking website.

Reference is made to documents NUREG/BR-0007 and NMMSS Report D-24 "Personal Computer Data Input for NRC Licensees." These documents describe the requirements for the reports. No change to these documents is explicitly detailed. The current versions of these documents are available on the web.

At the Nuclear Material Management Safeguards System Users meeting in San Diego, May 29 -June 1, NRC representatives indicated that changes to these documents are planned to enable tracking of foreign obligations.

In order to determine the burden of this information collection, these documents must be available for review by the user community prior to publication. The cost burden presented in the proposed rulemaking does not include any consideration for changes required to the reporting procedures.

Therefore, we request that the revisions planned and/or final copies of NUREG/BR-0007 and NMMSS Report D-24 be made available for public comment and that the comment period for review of the proposed rulemaking be extended.

Sincerely.

Neil A. Passman, Vice-President

/jb

Template = SECY-067

SECY-02