Comment on Part 26 Proposed Rule Change

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I am the Licensing Engineer for the FSV ISFSI (docket 72-09) and I've reviewed the proposed changes to Subpart A as identified on http://ruleforum.llnl.gov/cgi-bin/downloader/Part26_risk_lib/1054-0051.htm?st=risk

My observation is that the applicability to Part 72 specific licensees is an increase in regulations. The preliminary estimates for initial implementation and annual operating costs are significant.

My comment, therefore, is that the Commission recognize that this rule is an increase in the regulations imposed on Part 72 specific licensees. Cost estimates should be provided by the licenses to facilitate the finding required at 10 CFR 72.62(c)(2).

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Michael L. Croson P.O. Box 1625 Idaho Falls, ID 83415-1310 November 14, 2002 (11:30AM)

OFFICE OF SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

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