

7/30/2010
75 FR 44992

4

NRCREP Resource

From: Tom Gurdziel [tgurdziel@twcny.rr.com]
Sent: Wednesday, September 22, 2010 10:35 PM
To: Mensah, Tanya
Cc: Batkin, Joshua; 'Vanags, Uldis'; 'Sutton, Anthony'; paul_eddy@dps.state.ny.us; preisman@lohud.com; 'Clary, Gregory'; hillsc@INPO.org; Trapp, James; Hunegs, Gordon; Knutson, Ed; ESTRONSKI@aol.com; Spindler, David; thenry@theblade.com; Dempsey, Douglas; 'Robert Audette'
Subject: 2.206 Comments 2

I have these additional comments. (Note that I am using the page numbering available on my computer, such as 23 of 58, not the number on the bottom of any particular page.)

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Under Criteria for Petition Evaluation; Criteria for Reviewing Petitions Under 10 CFR 2.206 (1); last sentence of second bullet.

Change:

"The supporting facts must be credible and sufficient to warrant further inquiry."

To:

"The supporting facts must be credible."

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Under Criteria for Petition Evaluation; Criteria for Reviewing Petitions Under 10 CFR 2.206 (1); completely eliminate the third bullet and retain responsibility for the problem in the submitted petition instead of sending it someplace else.

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Under Criteria for Petition Evaluation; Criteria for Rejecting Petitions Under 10 CFR 2.206 (2) (continued); first bullet

Eliminate "or fails to provide sufficient facts to support the petition". With 4000 employees, you, (the NRC), should be the ones to either find enough facts to support the petition or to demonstrate it cannot be supported.

Also, change:

"or a general assertion without supporting facts"

To:

"or a general assertion"

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Under Criteria for Consolidating Petitions

Change these directions to handle each one separately. The submitting petitioners deserve this individual treatment.

These are my comments to the bottom of page 24 of 58.

Thank you

Tom Gurdziel

SOUSE Review Complete
Template=ADM-013

1 E-RIDS=ADM-03
Add = T. Mensah (THE)

Member, ASME