

MARTIN COMPANY

DOCKET NUMBER

PETITION RULE

PR-71

NUCLEAR
DIVISION
Baltimore 3,
Maryland

Refer to:
ACC-195

Mail No. 807
May 31, 1963

U. S. Atomic Energy Commission
Washington 25, D. C.

Attention: Mr. Robert Lowenstein, Director
Division of Licensing and Regulation

Subject: Comments on Proposed Revisions to Title 10
Code of Federal Regulations Part 71

Reference: (a) Letter from Robert Lowenstein
dated March 4, 1963

Gentlemen:

We have reviewed the proposed revisions to Title 10 Code of Federal Regulations Part 71 and generally concur with the overall intent of the Commission to standardize methods for shipment of special nuclear material.

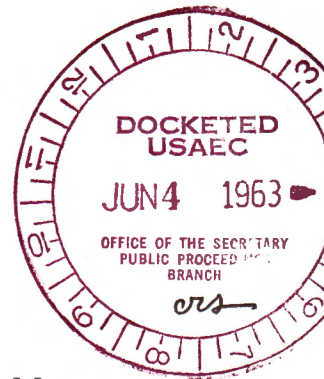
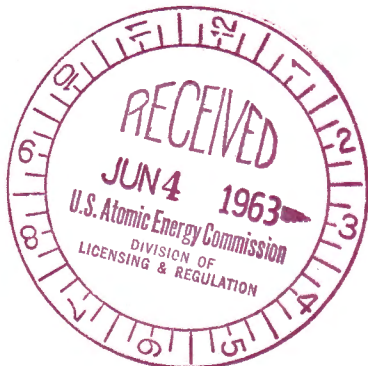
We note, however, that considerable detail on standards for shipment is included. It is our understanding that this information results from guidelines of the International Atomic Energy Agency. With further advance of the atomic energy industry, it is highly conceivable that new shipping methods and containers will be developed and, thus, subject this information to considerable and frequent changes. To provide the AEC greater latitude and ease in making changes, we recommend that paragraphs 71.31 through 71.93 be deleted from the proposed Part 71 and published as separate guidelines by the AEC.

In summary, we agree with the proposed regulation but believe that the formal method of modification through the Code of Federal Regulation route will impose an unnecessary administrative burden on both the Commission and its Contractors.

Very truly yours,

C. W. Keller
C. W. Keller
Nuclear Materials Manager

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THE AEROSPACE
DIVISION OF
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