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Secretary of the Commission
Att: Docket and Service Section
US Nuclear Regulatory Commission
Washington, DC 20555

The following comment concerning Revision 1 to Regulatory Guide 5.14, "Use of Observation (Visual Surveillance) Techniques in Material Access Areas", is presented for your consideration:

The regulatory guide presupposes the implementation of the "two-man concept" of security. Consumers Power Company believes that such a rule is unnecessary and that it forces the inefficient use of manpower. Sufficient safeguards are in place at the entrances and exits of MAA's and other protected areas to adequately ensure the proper accounting for special nuclear materials. Furthermore, Consumers Power Company believes that while some jobs may require surveillance for personnel protection, surveillance for security purposes is unwarranted.

Although these comments are being submitted beyond the due date, please consider them in future actions concerning this guide.

David P. Hoffman

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