

The Surety Association of America

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DOCKET NUMBER
PROPOSED RULE

④
PR-30,40,70,150,170
(44FR 50012)

September 19, 1979

URANIUM MILL TAILINGS AND
CONSTRUCTION OF MAJOR PLANTS
PROPOSED RULEMAKING
FEDERAL REGISTER, AUGUST 24, 1979



The Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Services Branch

Dear Sir:

This Association is a trade association of over 450 companies writing surety bonds throughout the United States. As such, we would like to offer a brief comment upon the captioned proposed regulations.

Section 40.32, Criterion 9 of these regulations sets forth the "financial surety arrangements" which each mill operator must establish to assure that sufficient funds will be available to decontaminate and decommission the mill and site and to reclaim the tailings or waste disposal areas. One of the alternatives proposed is the filing of surety bonds.

Upon a number of occasions I have discussed this subject with various members of the staff of the U.S. Nuclear Regulatory Commission and have indicated that I doubted there would be any market in the United States for such corporate surety bonds. We are pleased to note that other alternative methods of establishing financial responsibility are proposed and merely wish at this time to formally record our previous oral comments.

We would be happy to give you any additional information which you feel would be helpful.

Very truly yours,


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