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The Secretary  
Nuclear Regulatory Commission  
Washington, D.C. 20555



Gentlemen:

NRC 10CFR Parts 40, 150

I have just returned from Albuquerque where I attended the public hearings on the Generic Environmental Impact Statement on Uranium Milling. It was not possible for me to submit this comment in time to reach you before the 24th October date shown in the document.

## COMMENT

Under "License Requirements," Para 40.3 it is important to indicate a specific exclusion which would allow persons to own, receive, possess, use, transfer, deliver, import and export small quantities of tailings or leached uranium ore pulps for the purpose of conducting metallurgical or other testwork.

I have been involved with research into improving the metallurgical extraction processes for uranium to achieve better economics and to find ways to produce tailings that are more compatible with developments in tailings disposal technology. I also have visited uranium mills overseas to learn how certain types of process equipment performs, and what the nature of the tailings that are produced would be. It seems clear to me that the NRC wishes to encourage such work.

The requirement for a license to take small samples for the purposes stated above, would appear to be counterproductive and not in the interests of the Administration or the people of the United States.

It is requested that an appropriately worded exclusion be inserted into the regulations.

Acknowledged by card. 11/16. J. ....

Sincerely,

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Hans von Michaelis  
President

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