April 10, 1979

TO: Trip Rothschild, OGC

FROM: Richard J. Goddard, OELD

SUBJECT: PROPOSED MODIFICATION TO REGULATIONS ON EMPLOYEE SECURITIES OWNERSHIP

This letter is a followup to our recent telephone conversation re the proposed regulation change. The comments following are entirely my own, but many persons to whom I have spoken have expressed similar views.

1. First, let me state that I had no objections (at least nothing serious) with the present regs, and have no objection to the proposed prohibitions against owning securities in nuclear utilities, manufacturers/vendors of power or test reactors, or architectural/engineering companies as listed. Nor do I object to prohibitions re fuel cycle licensees and applicants, although the nuclear involvement of one or two listed appear minimal.

2. However, the compilation of nuclear "consultants" to be prohibited appears to me to reflect no exercise of reasonable judgment. The listing, in excess of 500 companies, contains numerous companies whose nuclear, or even energy-related, activity is clearly de minimis. Moreover, many of these are extremely large orgainizations with large and widely distributed security offerings, whose fortunes would be negligibly impacted by nuclear occurrences or a sudden increase in their present nuclear "involvement." For example, a cursory review of the list reveals the following:

ADT
Bancroft-Whitney Co.
Boeing
Computer Sciences Corp.
Control Data Corporation
Gulf + Western Industries (G+W Energy Products Group)
Signal Companies (Garrett Corp.)
Fred S. James & Co.
INA Corp. (Insurance Company of North America)
North American Philips
Portland Cement Association
Schlumberger
Smith, Barney & Co.
Smith Kline & French
Teledyne

While I am not, of course, intimately familiar with all of the above, I would imagine that no more than one or two of the listed companies derives as much as 1 or 2 percent of its revenues from the nuclear industry.

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3. As an example of the non-involvement of two of these corporations, in which I presently own common stock, I cite the following conversations:

Computer Sciences Corp. A call to the corporate treasurer revealed that CSC's nuclear activities were "definitely under 1%; we may do some software for others, but I don't know of any nuclear contact; we had abt 325 million revenues last year, and in no way could 3 million of that (1%) have come from the nuclear industry."
(Ref: Mr. Harry Rekas, El Segundo, CA, AC 213/ 678-0311)

Gulf + Western Indutries (G+W Energy Products Group is listed as a "Nuclear Consultant." A call to the corporate headquarters in New York City(to the treasurer) gave the following for G+W last year: Energy Products Group revenues, approx 200 million; G+W corporate revenues, more than 4.5 billion. A call to the controller of the Energy Products Group yielded the following: "While I can't give any exact figure, I would say the absolute maximum revenues from products related to the nuclear industry would be 30 million in sales; we are not a factor in the nuclear business at all; we do make one valve, a high-quality activator (?) steam isolation valve, sales about 4 million per year, but it doesn't affect us, we don't make any money on nuclear anyhow, and will probably have even less involvement in the future."
(Ref: Mr. Ed Hirschberg, Southfield, MI, AC 313/ 424-4570)

4. Insofar as a listing of prohibited organizations is to become part of NRC's regs, I would submit that some justification should be furnished for placing such companies on a list. Further, once a company is placed on such a list, any affected employee should have available a relatively workable mechanism for appeal, i.e., a simple means to justify present or future ownership of securities of such a company. I recognize the procedures to accomplish this end would be time-consuming. However, to infringe upon the personal rights of employees, where such ownership cannot be reasonably related to their employment activities to demonstrate a practical conflict of interest, is a major action which should not be accomplished easily.

5. Please advise me if there is to be a public meeting of any sort in regard to these proposed regs; I would be interested in attending one.

Sincerely,

Richard Goddard
x27312

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NRC - NTEU chapter 208

APR 16 1979

Memorandum for: N. Bentson, Chief, Labor Management and Employee Relations Branch, ADM

From: J.D. Thomas, Interim President, NTEU Chapter 208

Subject: EVALUATION OF PROPOSED MODIFICATION OF REGULATIONS REGARDING OWNERSHIP OF STOCK, BONDS, AND OTHER SECURITY INTERESTS BY NRC EMPLOYEES

This is to advise you that the Union has received the above cited proposal. To date we have received calls from numerous employees asking if the Commission was really serious about this proposal. The main concern expressed by most callers has been the extensive list of so called nuclear consultants contained on pages 5 through 8 of the proposal. Apparently, this list was compiled from the NRC Log of every visitor representing a company which has had any type of business with NRC whatsoever. (It's surprising that Beltway Limosines, the firm that operates the intra-agency shuttle, was not included on the list.)

In any event, the potential impact of this proposed regulation is so great that Chapter 208 feels that negotiations are in order. Prior to such negotiations, it would be most helpful if you could provide us with the following information:

1. Management's basis for lowering the $7500 rule to $1000.
2. Management's basis for requiring employees to divest of the securities on the prohibitied list in 180 days.
3. Whatever data that is available which indicates that the present regulation is not sufficient.
4. Management's proposal for reimbursing employees for losses as a result of this proposed rule.

Please contact me to arrange a mutually agreeable meeting date.

J. D. Thomas

J. D. Thomas
Interim President
NTEU Chapter 208

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ENCLOSURE 2

Title 10 -- Energy

CHAPTER 1 -- NUCLEAR REGULATORY COMMISSION

PART 0 -- CONDUCT OF EMPLOYEES

Ownership of Stocks, Bonds, and Other Security Interests by NRC Employees

AGENCY: U.S. Nuclear Regulatory Commission

ACTION: Final Rule

SUMMARY: The Nuclear Regulatory Commission has revised its regulations governing the ownership of stocks, bonds, and other security interests by NRC employees.

EFFECTIVE DATE: (Date of Publication in the Federal Register)

FOR FURTHER INFORMATION CONTACT: Trip Rothschild, Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555 (202 634-1465)

SUPPLEMENTARY INFORMATION: The Nuclear Regulatory Commission has conducted a thorough review of its regulations governing the ownership of stocks, bonds, and other security interests by NRC employees and determined that several changes should be made to 10 CFR 0.735-21 and 0.735-29. NRC employees and the National Treasury Employees Union commented on these proposed changes and the final rule adopted by the Commission incorporates some of their comments.

The amendments to 10 CFR 0.735-29 are best understood by briefly summarizing the origin of that section. Added to Part 0 on December 19, 1973, § 0.735-29 prohibited Atomic Energy Commission (the Commission's predecessor agency) employees involved in licensing and regulatory activities from owning security interests in the following types of entities: (a) any publicly or privately owned utility company engaged in the generation, distribution or sale of electric energy, or parent company of such company; (b) any company manufacturing or selling nuclear power or test reactors; (c) any architectural-engineering company primarily engaged in the design or construction of nuclear power or test reactor facilities; and (d) any company whose business consists substantially of serving as a consultant to companies engaged in activities licensed or regulated by the Commission. Upon creation of the Nuclear Regulatory Commission (which acceded to the Atomic Energy Commission's regulatory authority), the decision was made to apply the prohibition of § 0.735-29 to all full-time NRC employees as well as to certain special government employees.

The Commission is amending § 0.735-29 to better reflect the Commission's regulatory responsibilities and an individual employee's role within the agency. NRC employees will for the first time be permitted to own stock, bonds or other

security interests in electric utilities which have not been authorized by the Commission to construct or operate a nuclear reactor or do not have applications pending before the Commission seeking early site review or authorization to construct or operate a nuclear reactor. The Commission does not have jurisdiction over non-nuclear electric utilities and accordingly, we find little justification for prohibiting NRC employees from owning stock in those companies. Of cource, once a utility files an application seeking early site review or authorization to construct a nuclear reactor, employees would be prohibited from owning securities issued by that company and employees would be required to divest themselves of any security interests held in that company. The Commission will continue to prohibit its employees from owning bonds issued by state and local governmental entities in those cases where the primary purpose of the bond is to raise funds to operate or construct a nuclear reactor. The Commission is also retaining its prohibition on security interests issued by companies manufacturing or selling nuclear power or test reactors. The Commission is revising its prohibition on architectural-engineering companies so that it will be easier to provide employees with a list of firms whose securities they may not own. Commission employees will be prohibited from owning securities issued by architectural-

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engineering companies that have been engaged to provide services relating to a nuclear facility by an applicant for a construction permit, a holder of a construction permit, or an applicant for an operating license. In addition, employees will be prohibited from owning securities issued by architectural-engineering companies which have filed a standard reference design that is under Commission review, or has been approved by the Commission and is currently effective.

The Commission will also for the first time prohibit its employees from owning securities issued by fuel cycle applicants or licensees (companies engaged in milling, converting, fabricating, or reprocessing, source or special nuclear material). This category is added because a large number of Commission employees are involved in regulatory activities related to the nuclear fuel cycle.

[Add paragraph here on consulting firms summarizing Commission decision.]

The foregoing security ownership prohibitions will be applicable to all NRC employees occupying positions at the GS-13 level or above, and as well as all other employees who provide input into the decision-making process. (These employees will be designated by the Commission according to their

occupation code). The security ownership prohibitions will apply to the NRC employee, and to the employee's spouse, minor children, and any other member of the employee's household. The Commission considered applying the prohibitions as is done presently to all Commission employees. The Commission decided not to do so because many employees, such as clerical personnel, do not participate in the decision-making process. A far-ranging restriction on their personal investing freedom is unnecessary. This, however, does not create a regulatory gap which could allow these employees to profit from inside information gained as an NRC employee. NRC regulations prohibit all employees from directly or indirectly using or allowing the use of official information, obtained through or in connection with their government employment, which has not been made available to the general public, to further a private interest. 10 CFR 0.735-41.

To implement these provisions, NRC employees subject to this restriction will be given a list twice a year of those securities which they are prohibited from purchasing. Employees will be given [180 or 365] days from the time the list is published to divest themselves of any prohibited security interest. Employees will not be permitted to work on matters affecting an entity until they have divested themselves of

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the prohibited security, notwithstanding the provision of 0.735-21(c), discussed below. Employees will for the first time be required to certify annually that they are in compliance with 0.735-29. Employees will also sign such a certification within thirty days after commencing NRC employment. This codifies existing NRC practice.

With respect to securities which NRC employees are not prohibited from owning, Section 0.735-21 of the Commission's regulations permits NRC employees, including special government employees, to work on matters affecting the issuing entity provided that the current market value of the security interests held by the employee and members of his immediate household do not exceed $7500. The Commission is reducing that $7500 figure to $1000. The Commission believes that in some cases $7500 may be a significant portion of an employee's liquid assets and that an investment of that size could conceivably affect an employee's judgment. Accordingly, we are reducing the de minimis figure.

Because these amendments relate solely to matters of agency management or personnel, good cause exists for omitting notice of proposed rulemaking, and public procedure thereon, as unnecessary, and for making the amendments effective upon publication in the Federal Register.

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Pursuant to section 2201(p) of Title 42 of the United States Code, Executive Order 11222 of May 8, 1965, 5 CFR 735.104, and sections 552 and 553 of Title 5 of the United States Code, the following amendments to Title 10, Chapter 1, Code of Federal Regulations, Part 0, are published as a document subject to codification, to be effective _____ (date of publication in the Federal Register).

1. 0.735-21(c)(1) is revised to read as follows:

Exemption of remote or inconsequential financial interests. (1) In accordance with the provisions of 18 U.S.C. 208(b)(2) the NRC has exempted the following financial interests from paragraph (a) of this section and from the requirements of paragraph (b) of this section, upon the ground that such interests are too remote or too inconsequential to affect the integrity of its employees' services:

(i) Financial interests in an enterprise in the form of shares in the ownership thereof, including preferred and common stocks whether voting or nonvoting, and warrants to purchase such shares;

(ii) Financial interests in an enterprise in the form of bonds, notes, or other evidence of indebtedness;

(iii) Investments in State or local government bonds and investments in shares of a widely held diversified mutual fund or regulated investment company, except holdings in mutual investment funds or regulated investment companies dealing primarily in atomic energy stocks;

Provided, That, in the case of subdivisions (i) and (ii) of this subparagraph:

(a) The total market value of the financial interests described in said subdivisions with respect to any individual enterprise does not exceed $1000; and

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(b) the holdings in any class of shares, or bonds, or other evidences of indebtedness, of the enterprise do not exceed 1 percent of the dollar value of the outstanding shares, or bonds or other evidences of indebtedness in said class.

2. § 0.735-29 is amended to read as follows:

§ 0.735-29 Restriction against ownership of certain security interests by Commissioners, certain staff members and other related personnel

(a) No Commissioner or employee, including special government employees who are members of the Advisory Committee on Reactor Safeguards, the Atomic Safety and Licensing Board Panel or the Atomic Safety and Licensing Appeal Panel, who occupies a position at or above GS-13 or its equivalent, shall own any stocks, bonds, or other security interests issued by any entity falling within the categories set forth in subsection (b)(1). This prohibition also applies to employees who occupy positions below the GS-13 level that fall within occupational codes designated by the Commission. The restrictions set forth in this section apply to spouse, minor child, or other members of the immediate household of a Commissioner, employee, or special government employee. In cases where the entity covered by the prohibition is a subsidiary of another corporation, the prohibition extends to the parent company.

(b) The Commission will publish twice yearly a list of stocks, bonds, and other security interests which employees covered by this section may not

(1) These are stocks, bonds, or other security interests issued by:

(i) Publicly or privately owned utilities which have filed an application with the Commission requesting an early site review, or seeking authorization to construct or operate a facility for the generation of electric energy by means of a nuclear reactor and those

utilities which have received a construction permit or an operating license from the Commission that is currently effective.

(ii) State or local governments, if the primary purpose of the security is to finance the construction or operation of a nuclear reactor.

(iii) Companies manufacturing or selling nuclear power or test reactors.

(iv) Architectual-engineering companies that have been engaged to provide services relating to a nuclear facility by an applicant for a construction permit or an applicant for an operating license, and architectural-engineering companies which have filed a standard reference design that is under Commission review or has been approved by the Commission and is currently effective.

(v) Nuclear consultants (the Commission has three options):

(a) delete this category;

(b) any company or firm which serves as a consultant on activities licensed or regulated by the NRC;

or

(c) any company or firm which serves as a consultant on activities regulated by the NRC, and is designated by the Commission because of its substantial involvement in the commercial nuclear field.

(2)(i) An individual covered by this section who owns any securities described in paragraph (a)(1) shall dispose of them no later than [180] or [365] days after the entities first appears on the list described in paragraph (a). Notwithstanding the provisions of § 0.735-21, no employee may participate personally and substantially in a particular matter affecting an entity that appears on the list as long as the employee or his spouse, minor child, or other members of his immediate household owns the security interest.

(ii) An individual newly employed by NRC who is covered by this section shall dispose of any securities described in paragraph (a)(1) that the employee may own no later than 30 days after his entrance on duty and within the same period shall ensure and sign a certification that neither the employee nor any individual who is covered by this section through relationship with him owns any securities described in that paragraph.

(c) Each individual employed by NRC who is covered by this section shall each year sign either (i) a certification that neither he nor any individual covered by this section through relationship with him owns any securities described in paragraph (a)(1) or, if he or any such individual in fact owns securities therein described, (ii) a certification identifying them, disclosing how and when they were acquired and stating approximately when they will be disposed of.

(d) Securities described in paragraph (b)(1) that are acquired by an individual who is covered by this section through gift, inheritance or other similar involuntary manner shall be disposed of within a reasonable time.

(e) The Commission may exempt an employee from the restrictions of this section where divestiture of the stock, bond, or other security interest is determined to be inequitable by the Commission.

For the Commission

SAMUEL J. CHILK
Secretary of the Commission

Dated at Washington, D.C.

this ___ day of _____, 1979.

ENCLOSURE 3

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Employees Covered by Proposed Ownership Restrictions

1. All Employees classified as GS-13 and above; and

2. All Employees below GS-13 who are in the following Occupational Codes:

Occupational Codes	Job Category
000-0 - 0099-0	Security
0100-0 - 0199-0	Social Science, Physchology & Welfare
0200-0 - 0299-0 except 0203	Personnel
0300-0 - 0399-0 except 0301, 0302, 0313, 0316, 0318, 0322. 0324, 0335, 0356, 0382	Administrative and Program Management
0400-0 - 0499-0	Biological Sciences
0500-0 - 0599-0 except 0501, 0520, 0522, 0530, 0540, 0544	Accounting and Budget
0600-0 - 0699-0	General Health Sciences
0800-0 - 0899-0	Engineering and Architecture
0900-0 - 0999-0	Legal and Kindred
1000-0 - 1099-0 except 1022, 1060, 1084, 1087	Information
1100-0 - 1199-0 except 1106	Contract and Procurement
1222-0	Patent
1300-0 - 1399-0	Physical Sciences
1400-0 - 1499-0	Library and Technical Information
1500-0 - 1599-0	Mathematics and Statistics
1600-0 - 1699-0	Equipment, Facilities and Service
1700-0 - 1799-0	Education Research and Program
1800-0 - 1899-0	Investigation
1900-0 - 1999-0	Quality Assurance, Inspection and Grading
2000-0 - 2099-0	Supply Group

COMPANIES IN WHICH NRC EMPLOYEES COVERED BY 10 CFR 0.735-29
WOULD BE PROHIBITED FROM OWNING STOCKS, BONDS, OR
OTHER SECURITY INTERESTS

1. Nuclear Utilities

Alabama Power Company
*Alachua Electric Department, Florida
Allegheny Electric Cooperative, Inc.
American Electric Power Co., Inc.
*Anaheim Electrical Division, Calif.
Appalachian Power Company
Arizona Public Service Company
Arkansas Power & Light Company
*Ashburnham Municipal Light Dept., Massachusetts
Associated Electric Cooperative, Inc.
Atlantic City Electric Company
*Austin Electric Department, Texas
Baltimore Gas & Electric Company
Bangor Hydro-Electric Company
Boston Edison Company
*Boylston Municipal Light Department, Massachusetts
*Burbank Public Service Department, California
*Burlington Electric Department, Vermont
*Bushnell Utility Dept., Florida
*California Department of Water Resources
Cambridge Electric Light Co.
Canal Electric Company
Carolina Power & Light Company
Central Hudson Gas & Electric Corp.
Central Iowa Power Cooperative
Central Maine Power Company
Central Power & Light Company
Central & Southwest Corporation
Central Vermont Public Service Corp.
*Chicopee Electric Light Department, Massachusetts
Cincinnati Gas & Electric Company
Cleveland Electric Illuminating Co.
Columbus & Southern Ohio Electric Co.
Commonwealth Edison Company
Connecticut Light & Power Company
Connecticut Yankee Atomic Power Co.
Consolidated Edison Co. of New York
Consumers Power Company
Cooperative Power Association
Corn Belt Power Cooperative
Dairyland Power Cooperative
Dallas Power & Light Company
*Dalton Water & Light Commission, GA
*Danvers Electric Dept., Massachusetts
The Dayton Power & Light Company
Delmarva Power & Light Company
Detroit Edison Company
Duke Power Company
Duquesne Light Company
Eastern Utility Associates
El Paso Electric Company
*Eugene Water & Electric Board, Oregon
Fitchburg Gas & Electric Light Co.
Florida Power Corporation
Florida Power & Light Company
*Gainesville-Alachua County Regional Electric, Water, and Sewer Utilities Board, Florida
General Public Utilities Corporation
Georgia Power Company
*Glendale Public Service Dept., CA
Green Mountain Power Corporation
Gulf States Utilities Company
Hartford Electric Light Company
*Hingham Municipal Lighting Plant, Massachusetts

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* Those entities marked by an asterisk are municipal or state government organizations. Ownership of bonds or other financial instruments issued by such organizations is proscribed only when such bonds or other financial instruments are specifically for the construction of nuclear power plants.

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*Holden Municipal Light Dept., Massachusetts
*Holyoke Gas & Electric Dept., Massachusetts
Houston Lighting & Power Co.
*Hudson Light & Power Dept., Massachusetts
Illinois Power Company
Indiana & Michigan Power Co.
Interstate Power Company
Iowa Electric Light & Power Co.
Iowa-Illinois Gas & Electric Co.
Jersey Central Power & Light Co.
Kansas City Power & Light Co.
Kansas Gas & Electric Co.
*Kissimee Utilities, Florida
Lake Superior District Power Co.
*Leesburg Municipal Electric Dept., Florida
*Littleton Electric Light & Water Dept., Massachusetts
Long Island Lighting Company
*Los Angeles Dept. of Water & Power, California
Louisiana Power & Light Co.
*Lyndonville Electric Dept., VT
Madison Gas & Electric Company
Maine Public Service Company
Maine Yankee Atomic Power Co.
*Mansfield Municipal Electric Dept., Massachusetts
*Marblehead Municipal Light Dept., Massachusetts
Massachusetts Municipal Wholesale Electric Co.
Metropolitan Edison Company
*Middleborough Gas & Electric Dept., Massachusetts
Middle South Utilities, Inc.
*Middleton Municipal Light Dept., Massachusetts
Mississippi Power & Light Co.
Montaup Electric Company
Municipal Electric Authority of GA
Nebraska Public Power District
Nevada Power Company
New Bedford Gas & Edison Light Co.
New England Electric System
New England Gas & Electric Association
New England Power Company
*New Smyrna Beach Utilities Commission, Florida
New York State Electric & Gas Corp.
Niagara Mohawk Power Corporation
*North Attleborough Municipal Electric Light Dept., Massachusetts
North Carolina Municipal Power Agency No. 1
Northeast Utilities
Northern Indiana Public Service Company
Northern Michigan Electric Cooperative
Northern States Power Company
*Ocala Utilities Division, Florida
Oglethorpe Electric Membership Corp.
Ohio Edison Company
Omaha Public Power District
Orange & Rockland Utilities, Inc.
*Orlando Utilities Commission, Florida
Pacific Gas & Electric Company
Pacific Power & Light Company
*Pasadena Water & Power Dept., CA
*Pascoag Fire District (Electric Dept.), Rhode Island
*Paxton Electric Light Department
*Peabody Municipal Light Plant, MA
Pennsylvania Electric Company
Pennsylvania Power Company
Pennsylvania Power & Light Company
Philadelphia Electric Company
Portland General Electric Company
Power Authority of the State of New York
Public Service Company of Colorado
Public Service Company of Indiana, Inc.
Public Service Company of New Hampshire
Public Service Company of New Mexico
Public Service Company of Oklahoma
Public Service Electric & Gas Company
Puerto Rico Water Resources Authority
Puget Sound Power & Light Company
*Reading Municipal Light Dept., MA
*Riverside Public Utilities, CA
Rochester Gas & Electric Corporation
*Sacramento Municipal Utility District
Salt River Project Agricultural Improvement & Power District

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*San Antonio Public Service Board, Texas
San Diego Gas & Electric Company
*Sebring Utilities Commission, FL
Seminole Electric Cooperative, Inc.
*Shrewsbury Municipal Light Plant, Massachusetts
South Carolina Electric & Gas Co.
South Carolina Public Service Authority
Southern California Edison Company
Southern Company
*South Hadley Electric Light Dept., Massachusetts
Soyland Power Cooperative, Inc.
*Tallahassee Electric Dept., FL
*Taunton Municipal Lighting Plant, Massachusetts
*Templeton Municipal Lighting Plant, Massachusetts
Tennessee Valley Authority
Texas Electric Service Co.
Texas Power & Light Co.
Texas Utilities Company
Toledo Edison Company
Union Electric Company
United Illuminating Company
Vermont Electric Power Cooperative
Vermont Electric Power Co., Inc.
Vermont Yankee Nuclear Power Corp.
Virginia Electric & Power Corp.
Wabash Valley Power Association
*Wakefield Municipal Light Dept., Massachusetts
Washington Public Power Supply System (WPPSS)
Washington Water Power Company
*West Boylston Municipal Light Dept., Massachusetts
Western Farmers Electric Coop.
Western Illinois Power Cooperative, Inc.
Western Massachusetts Electric Co.
*Westfield Gas & Electric Light Dept., Massachusetts
Wisconsin Electric Power Company
Wisconsin Michigan Power Company
Wisconsin Power & Light Co.
Wisconsin Public Service Corporation
Wolverine Electric Cooperative, Inc.
Yankee Atomic Electric Company

2. Manufacturers/Vendors of Power or Test Reactors

Combustion Engineering
General Electric
Gulf Oil (General Atomic)
McDermott Corp. (Babcock & Wilcox)
Offshore Power Systems
Shell Oil (General Atomic)
Westinghouse

3. Architectural Engineering Companies

Bechtel
Black & Veatch
Brown & Root
Burns & Roe
C. F. Braun
Ebasco
Fluor-Pioneer
Gibbs & Hill
Gilbert Associates/Commonwealth Companies
Sargeant & Lundy
Stone & Webster
Southern Services Co.
United Engineers & Constructors

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4. Fuel Cycle Applicants and Licensees

Plutonium Fabricators

McDermott (Babcock and Wilcox)
Exxon
General Electric
Kerr McGee
Westinghouse

Uranium Fabricators

Combustion Engineering
Exxon
General Electric
Kerr McGee
McDermott (Babcock and Wilcox)
Nuclear Dynamics (General Atomic)
Nuclear Fuel Services
Rockwell International (Atomic International)
Texas Instruments
U.S. Nuclear
United Nuclear
Westinghouse

Uranium Hexafluoride Producers

Kerr McGee
Allied Chemical

Fuel Reprocessors

Nuclear Fuel Services

Uranium Mills -- Applicants and Licensees

American Nuclear Corp.
Atlas Minerals
Cleveland Cliffs Iron Company
Commonwealth Edison (Carter, Inc., Plateau Resources)
Energy Fuels Nuclear
Exxon Company
Federal American Partners
Federal Resources Corp.
Getty Oil (Petrotomics Company)
Holmes and Narver, Inc.
Homestake Mining Company
J&P Corporation
Kerr-McGee Corporation
Nuclear Dynamics, Inc.
Ogle Petroleum
Pathfinder Mines Corp.
Phelps-Dodge (Western Nuclear, Inc.)
Rio Algom Mines Ltd.
Union Pacific (Bear Creek Uranium Company)
Union Pacific (Rocky Mt. Energy -- Haliburton Joint Venture)
TVA
Union Carbide
Union Oil (Minerals Exploration)
United Nuclear Corp.
Wold Nuclear Company
Westinghouse (Wyoming Mineral Corp.)

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Nuclear Consultants

ACF Industries, Inc.
Ackenheil & Assoc.
Accelerators, Inc.
ADT
Aerospace Corporation
Aerotherm Acurex Corp.
Aerotest Operations
Agatha Corp.
Agbabian Assoc.
The Louis Allis Co.
Ameron
Amperex Electronic
Amphenol Sams Div.
Analytic Services, Inc.
Anchor-Darling Valve Co.
Anderson Greewood & Co.
Applied Engr.
Applied Metro Technology
Applied Nucleonics
Applied Research Corp.
Applied Technol. Assoc.
E. D'Appolonia Consulting Engrs.
Aquatic Control, Inc.
ARHCO-Commercial Nuclear Studies
Associated Consultants International Corp.
ATCOR, Inc.
ATEC Assoc. of Maryland
Atwood & Morrill Co.
Auisco, Inc.
BDM Corporation
Gage Babcock and Associates, Inc.
The Badger Co.
Baird Atomic
Baker & Taylor Co.
Baldwin Assoc.
Ball Bros. Research Corp.
Bancroft-Whitney Co.
Barbay Engineers
Basic Technol., Inc.
W.T. Batcheller Internat'l
B.B. Nuclear Energy Consult.
R.W. Beck & Assoc.
Beckman Instruments
Benham-Blair & Affiliates
Bicron Corp.
Bio Engineering
M.W. Bittinger & Assoc.
H.B. Block & Associates
Blount Bros. Corp.
BMR Security Products
Boeing Corporation
Bowser-Morner Testing Lab.
Booz-Allen Applied Research
Boston Inulated Wire & Cable
W.H. Brady Co.
Brand Industrial Serv.
Briggs Engr. & Testing
Frank Briscoe Co.
Brock & Blevins Co.
Dayton T. Brown, Inc.
Brown Engineering
Brown Boveri Corp.
Burns & McDonnell
California Cartage Co.
Calspan Corp.
Cameron Engineers
Canberra Industries
Carborundum Co.
The Carlson Corp.
Carpenter Technology
Chem Nuclear Systems
Chiasma Consultants
CH_2M Hill
Charles River Assoc.
Civil Nuclear Systems
G.D. Clayton & Assoc.
F.L. Clifford Assoc.
Clow Corp.
Coastal Radiation Serv.
Columbia Services, Inc.
Computer Science Corp.
Comstock/Jackson Wading River
L.K. Comstock & Co.
Conax Corp.
Consolidated Energy Serv.
Control Data
Controls for Environmental Pollution
Coratomic, Inc.
Cosmodyne
Crawford & Russell, Inc.
Creare, Inc.
Crouse-Hinds Co.
Cryenco
CTI Nuclear
CVI Corp.
Consolidated Controls Corp.
Daedalean Assoc., Inc.
Daedalus Enterprises
Dames & Moore
Datomation
Dearborn Chem. Div.
Delat Labs.
Delphia Industries
De Ment Labs.
Denardo & McFarland
C.J. Deravin Co.
Diagnostic Isotopes
Dikewood Industries
Dielman Consultants
Dis-Con, Inc.
John Dolio & Assoc.
Richard N. Donelson & Assoc.
Dunegan/Endevco
E Systems, Inc.
Earthquake Engineering Systems
Earth Sciences
Eberline Instrument Corp.
Ecodyne Corp.
Ecological Analysts
Ecology & Environment
Ecology Audits
Ecos. Inc.
EDAC
Editech
EDS Nuclear
Edlow International

Electro Nucleonics
Elwood Nuclear Safety
ENEL
Energy Engineering Group
Energy, Inc.
Energy Research & Tech. Center
Energy Research Group
Energy Services Corp.
Engineering Analytics
Engineering Decision Analysis
Engineering, Inc.
ENSCO, Inc.
Environment Consultants
Environmental Analysts
Environmental Radiation Mgmt.
Environmental Research & Technol.
Environmental Sci. & Engr.
Environmental Technol. Assessment
Erico Products
Ethicon, Inc.
Evans Hamilton, Inc.
Failure Analysis Assoc.
Factory Mutual Research
Farr Co.
Fegles-Power Service Corp.
Ralph M. Field & Assoc.
Fields Griffith Assoc.
Fischbach/Lord Elec. Co.
Fisher & Porter Co.
The Howard P. Foley Co.
Foundation Sciences
Forrest & Cotton
Foster Assoc.
Fox Valley Tech.
Freese & Nichols
Frick Co.
Fruin-Colnon Corp.
Fugro Corp.
Fuller Engr.
GAF Corp.
Gamma Industries
G&W Energy Products Group
Garrett Corp.
GCA/Technol. Div.
Genasys Dynamics Corp.
General Analytics, Inc.
General Dynamics Corp.
General Physics Corp.
General Research Corp.
Geophysics Research & Development Corp.
Geraghty & Miller
Gifford Hill & Co.
Global Engr.
Gollob Analytical Serv.
Griffith & Stokes
Gulf South Research Inst.
Hales & Co.
Haley & Aldrich
Frank B. Hall & Co.
Halliburton/Welex
Halliburton Services
Harding-Lawson Assoc.
Harleco
Frederic H. Harris, Inc.
Harris Corp.
Harris & Walsh
Hazeltine Corp.
Health Physics Associates
Health Research Group
Health Science Assoc.
Heyward-Robinson
Gifford Hill & Co.
Hill Ingman Chase & Co.
Hittman Nuclear & Devel. Assoc.
Hudson Products Corp.
Robert W. Hunt Co.
ICN Life Sciences
IMC Chemicals Corp.
INA Corp.
Industrial Bio-Test Labs.
Industrial Engineering & Equip. Co.
Industrial Hygiene Engr. Assoc.
Industrial Nucleonics Corp.
Industrial Reactor Labs.
Ingersoll-Rand
Inland-Ryerson Constr. Prod. Co.
Insulated Cable Corp.
Institute of Systems Sciences
Intelecom Rad Tech.
Interdevelopment, Inc.
Intermountain Technology
Interex Corp.
International Consultants
Internat'l Research & Technol. Corp.
Isotopes, Inc.
ITE Imperial Corp.
JRB Associates, Inc.
JBF Scientific Corp.
Fred S. James & Co.
E.R. Johnson & Assoc.
Wm. B. Johnson & Assoc.
Kafin & Needlam
Kalamazoo Radiology/PC
Kaman Sciences Corp.
Karl, Zepf, Freitag & Assoc.
J.J. Keller & Assoc.
The Kerite Co.
Kevex Corp.
Walter Kidde & Co.
Kinemetrics, Inc.
KSB Technical Sales
Kuhlam Corp.
Lake Systems Corp.
Ledoux & Co.
Leslie Co.
W.M. Lewis & Assoc.
LFE Corp. Environmental Analysis
Limback Co.
Litwin Corp.
Lockwood Greene Engrs.
Loss Prevention Diagnostics
LND Inc.
Ludlam Measurements
Lulejan & Assoc.
The Lummus Co.

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The Lunkenheimer Co.
Madigan-Praeger, Inc.
Magnetrol International
Mallenkrodt, Inc.
Management Analysis Center, Inc.
Marin Systems, Inc.
Master Specialties Co.
Mathematical Applications
Mathematic Sciences Northwest, Inc.
MBH Environmmental Consultants
McCormack's Highway Transp.
Jack McCormick & Assoc.
I.J. McCullough, Inc.
Arthur G. McKee & Co.
McNeil Labs.
Measurex Corp.
Mechanics Research, Inc.
Medco Engineering
Medi-Physics
Medtronic, Inc.
Mercury Co. of Norwood
Meterology Research
Metrics, Inc.
Micromedic Systems
Miller-Picking Corp.
Mineral Insulated Component Systems
Min Max
The Mitre Corp.
Morse Products Mfgr.
MPR Assoc.
D.W. Murray Co.
Myers Assoc.
NL Industries
Naeco Assoc.
Nalls & Co.
Napko Corp.
Nash Engr.
National Biocentric
National Nuclear Corp.
NERA, Inc.
Newport News Industrial Corp.
Neutech, Inc.
Neutron Products
Nooter Corp.
North Amer. Phillips
Northern Scientific
NPS Anatek
NPS Designs
Nuclear Associates International Corp.
Nuclear Battery Corp.
Nuclear Chicago
Nuclear Data, Inc.
Nuclear Diodes, Inc.
Nuclear & Systems Sci. Group
Nuclear Associates, Inc
Nuclear Assoc. Internat'l
Nuclear Assurance Corp.
Nuclear Consulting Services
Nuclear Energy Services
Nuclear Engr. Co., Inc.
Nuclear Engr. Service Co.
Nuclear Environmental Engr. Co.
Nuclear Environmental Serv.
Nuclear Management
Nuclear Marketing & Consulting
Nuclear Measurements Corp.
Nuclear Plant Services
Nuclear Radiation Devel.
Nuclear Safety Assoc.
Nuclear Safety Research Assoc.
Nuclear Services Corp.
Nuclear Systems, Inc.
Nuclear Support Services
Nuclear Water & Waste Technol., Inc.
Wm. W. Nugent & Co.
Nunn, Snyder & Assoc.
NUS Corp.
NUSAC, Inc.
Joseph Oat & Sons
O'Donnell & Associates
The Ohmart Corp.
Olympic Engineering Corp.
OMN: Spectra, Inc.
Operational Systems, Inc.
The Pace Companies
Pacific NW Water Lab.
Pacific-Sierra Research Corp.
Pacific Scientific
G.G. Pagonis Assoc.
Pall Trinity Micro Corp.
Parameter, Inc.
Peabody Testing Services
Pezzullo, Sweeney & Assoc.
Physics International
Pickard, Lowe and Garrick, Inc.
Pucius Pitkin, Metropolis
Pioneer Industronics Corp.
Planning Research Corp.
PMB Systems Engr.
Porter-Gertz Consultants
Portland Cement Assoc.
John W. Powell Consultants
The Wm. Powell Co.
Power Piping Co.
Power Regulatory Co.
Power Systems Group Amete
Power Systems, Inc.
J.F. Pritchard & Co.
Princeton Gamma-Tec
Process Research
Procon, Inc.
Project Management Corp.
Proto-Power Management Corp.
The Pyle-National Co.
Q/A Corp.
Quirk, Lawler & Matusky
Racon, Inc.
Radeco, Inc.
Rader & Assoc.
Radiation Corp.
Radiation Detecting Equip.
The Radiation Health Center

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Radiation Management Corp.
Radiation Research Assoc.
Radiation Services Org.
Radiation Technol. Programs
Radiological Science Corp.
Radiology Assoc.
Byron D. Rall & Assoc.
Ramney Method Western Corp.
R&D Associates
REMAC
The Research Corp.
Reuther-Stokes
Rist-Frost Assoc.
RMI Co.
Rockwell Internat'l Corp.
Rohm & Haas Co.
William H. Rorer, Inc.
Roundant Associates
RSA Corp.
RTI-Engr.
Sartorius & Co.
SCS Engineers
Scandpower
Schirmer Engr. Corp.
Schlumberger Tech. Corp.
Schlumberger Well Services
Schneider, Inc.
M.C. Schumacher, CHP
Schutte & Koerting Div.
Schwarz/Mann
Science Applications, Inc.
Scott Aviation Div. A-T-O
Seismic Exploration, Inc.
Seismograph Service Corp.
Senco Products
Sentracon Systems
Shannon & Wilson & Agbabian Assoc.
The Banjamin F. Shaw Co.
Shondore Engr.
Showcase Corp.
Silas Mason Co.
D.D. Smith & Assoc.
Smith, Barney & Co.
Smith, Kline & French Labs.
Solid State Radiation
Southern Engineering of Georgia
Southern Nuclear Engr.
Southern Services
Southwest Econometrics, Inc.
Space Science Services
SSP Products
STAFCO, Inc.
STAT-A-MATRIX
The S.M. Stoller Corp.
STV, Inc.
Sulzer Bros.
Sundstrand Nuclear Accessories
Suntac Nuclear Corp.
Sutter International Equip. Corp.
Sweet & Assoc.
Swindell-Dressler
Syn-An, Inc.
Systems Science & Software
Systems Engr. Co.
Systems Engr. Labs
Tadjer-Cohen-Assoc.
Technical Operations, Inc.
Teknekron, Inc.
Teledyne Materials Research
Tennessee Eastman
Tetra Tech., Inc.
Texas Instruments, Inc.
Thermo Electric
Thermo Electron Engr.
C.W. Thompson Co.
Tippetts-Abbett-McCarthy-Stratton
Transcomm., Inc.
Transnuclear, Inc.
Transfer Systems, Inc.
TRC-Research Corp.
TRI Nuclear Corp.
Tri-State Motor Transit
TRW, Inc.
Underwood Jordan Assoc.
Union Security Services
The Unitech Co.
United Engineers and Construction
United Nuclear Industries
United Power Assoc.
United Services
United States Radium
University Engineers
U.S. Nuclear, Inc.
Uranium Recovery Corp.
URS Research Co.
Valve Engr. Lab.
Allen D. Vaughan, Industrial Hygienist
Victoreen Instrument Co.
Videotechniques
Vista Pines, V-1
Vitro Engineering
Vitro Labs.
W.A. Wahler & Assoc.
Joseph S. Ward & Assoc.
Washington Researchers
Water Assoc.
The Weatherhead Co.
Weather Measure Corp.
Weidlinger Assoc.
Welex
Werner & Pfleiderer Corp.
Western Concrete Structures
Western Nuclear, Inc.
Roy F. Weston, Inc.
Weston Components
Weston Geophysical Engr.
Weston Schlumberg
The Ralph White Co.
Whittaker Corp.
J.H. Wiggins Co.
Adrian Wilson Assoc.
Frank S.G. Williams & Assoc.
Wismes & Becker
Wiss, Janney, Elstner & Assoc.
Woodward-Clyde Consultants
Woodward-Envicon
Woodward-Gardner & Assoc.
Woodward-Krazynski & Assoc.
Woodward-Lundgren & Assoc.
Woodward-McMaster & Assoc.
Woodward-McNeill & Assoc.
Woodward-Moorhouse & Assoc.
W.J. Wooley & Co.
Charles Yulish Assoc.
H.B. Zachry Co.
H. Zinder & Assoc.
Zollman Assoc.

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