



NRC PUBLIC DOCUMENT ROOM

Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

DOCKET NUMBER PR-9 (27)
PROPOSED RULE

44 FR 22746

June 14, 1979

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Docketing and Service Branch



Dear Mr. Chilk:

PROPOSED "PLAIN ENGLISH" REVISION
OF FREEDOM OF INFORMATION ACT RULE

We have recently reviewed the advance notice of Proposed rulemaking regarding the Commission's regulation, 10 CFR Part 9, as published in the Federal Register on April 17, 1979. The revised rule was prepared on an experimental basis to determine if, in its revised form, it is more useful to members of the public who submit requests to the NRC under the Freedom of Information Act. During this review we compared the revised rule to the applicable existing portions of 10 CFR Part 9. We would offer the following comments on "plain language" revisions:

- (1) The organization, format, and syntax of the revised rule appear to make the rule somewhat easier to apply and follow. This may make it possible for the public to more easily determine how to make a Freedom of Information Act request. However, it is our opinion that this revised rule does not represent a significant enough increase in clarity to warrant the expenditure of time and funds necessary for a public rulemaking.
- (2) We agree with the Commission expressed intent not to undertake an overall "plain English" revision of its regulation. We do feel that there are sections and parts of the Commission regulations which are harder than others to understand and interpret. A notable example of such a section is 10 CFR Part 21. It is suggested that further NRC experiments and development of "plain language" rules should be concentrated in areas such as 10 CFR Part 21 which already have been proven difficult to understand by the public. We further agree with the NRC's intent that all new amendments be written in as simple and clear a manner as possible.

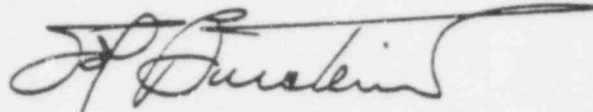
2
7 9072609 68

35-
ACKNOWLEDGED JUN 21 1979

June 14, 1979

Thank you for this opportunity to comment in advance on your proposed rulemaking.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Sol Burstein", with a long horizontal flourish extending to the right.

Executive Vice President

Sol Burstein

425 358