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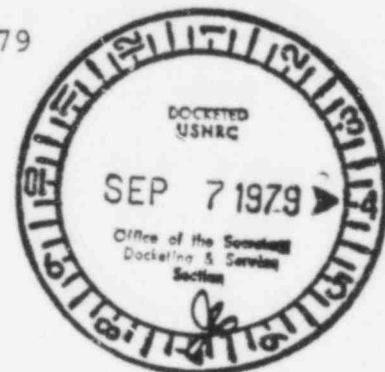
DOCKET NUMBER PR-40 et al (4)
 PROPOSED RULE (44FR41468)

August 31, 1979

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

Attention: Docketing and Service Branch

Dear Sir:



The following are Commonwealth Edison's comments on the Proposed Rule for Implementation of the United States/International Atomic Energy Agency Safeguards Agreement.

1. We concur with the statement made in the commentary to the proposed regulations with respect to "inventory changes" which states that "...in the case of reactors, the measurement system described in Section 75.21 (d) will be designed to provide for the determination of 'burnup' at appropriate times, and only at such intervals will an inventory change require reporting." We urge that this statement be included in the regulations and that "burnup" determinations be reported only at such times as a Form DOE/NRC 742 is otherwise required.

2. Section 75.32 of the proposed regulations requires an initial report be filed within 20 days after the initial reporting date. Since detailed listings of each nuclear fuel assembly will be required, it is our opinion that a complete filing within 20 days may not be possible for a reactor operator because burnup calculations are required up to the reporting date and the volume of data required for possibly thousands of fuel assemblies. Therefore, we cannot guarantee complete reporting within the 20 day time limit.

3. The proposed regulations seem to indicate that our routine inventories of fuel pools and vaults made for internal control purposes may trigger a requirement for fuel reporting of materials balance reports, including a listing of all fuel assemblies, under Section 75.35. We do not believe that such reporting is necessary in the case of a reactor operator.

We trust the above comments will assist you.

Very truly yours,

C. Reed

Cordell Reed
 Assistant Vice President

Acknowledged by card... 9/10

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