



DOCKET NUMBER

PROPOSED RULE

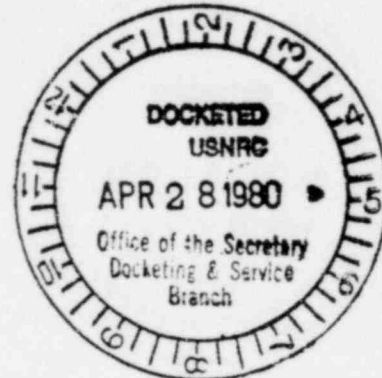
PR-19 et al. (12)
(45 FR 15184)

April 23, 1980

M. L. Borchelt
Executive Vice President and
Chief Engineering Officer

Mr. Samuel J. Chilk, Secretary
Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch



Re: Proposed Rules, Protection of
Employees Who Provide Information;
10 CFR 19, 30, 40, 50, 70, 71, 150;
45 FR 15184; March 10, 1980

Dear Mr. Chilk:

I am concerned about the posting requirements specified in the above described rules. As written, I fear the rules could be interpreted as requiring the posting of Form NRC-3 at every work location of a licensee or an applicant, regardless of the type of work carried on at that location. In the case of Central Power and Light Company, there are over 100 work locations, ranging from the Home Office to powerplants to service centers to local offices. The vast majority of these are not involved in matters over which the Commission has regulatory authority, and the employees are not involved in endeavors which would be of interest to the Commission.

Therefore, it would seem inappropriate to clutter the bulletin boards at these locations with information of doubtful value to the employees. The more such information placed on the bulletin boards, the less likely the employees will find the information which is of actual value to them.

As I do not feel this unnecessary cluttering was intended by the Commission, I propose the sentence, "Posting shall be at locations sufficient to permit employees to observe a copy on the way to or from their place of work," be modified by the insertion of "in the licensee's or applicant's home office, in facilities for which an application has been filed or a license issued, or work locations supporting such facilities" between "locations" and "sufficient" and the insertion of "at these work



A Member of the Central and South West System

Central Power and Light
Corpus Christi, Texas

Public Service Company of Oklahoma
Tulsa, Oklahoma

Southwestern Electric Power
Shreveport, Louisiana

West Texas Utilities
Abilene, Texas

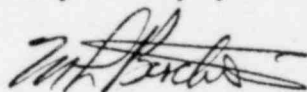
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locations" between "employees" and "to". The sentence would then read, "Posting shall be at locations in the licensee's or applicant's home office, in facilities for which an application has been filed or a license issued, or work locations supporting such facilities sufficient to permit employees at these work locations to observe a copy on the way to or from their place of work."

Thank you for your consideration of this proposal.

Very truly yours,



M. L. Borchelt

MLB:llg
flow

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Jane Kilby
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