

PATHFINDER

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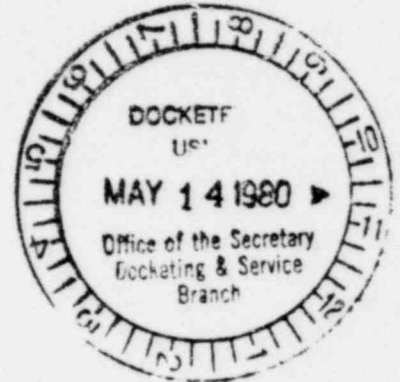
DOCKET NUMBER

PROPOSED RULE

PR-19, 30, 40, 50, 70,
71, 150
(45 FR 15184)

(25)

May 9, 1980



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

Attn: Docketing and Service Branch

Gentlemen:

Following are our comments concerning the proposed amendments to 10 C.F.R. Parts 19, 30, 40, 50, 70, 71 and 150:

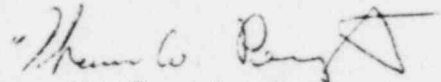
1. The proposed regulations appear to be beyond the jurisdiction of the NRC and without statutory basis.
2. The proposed regulations are vague in specifying the types of information which employees may disclose. The phrase "information furthering the purposes of such Acts" is so vague as to make it impossible to determine what types of information are involved. Moreover, language used in the prefatory comments to the proposed regulations, as printed in the Federal Register, indicate that such information might include antitrust matters. It is doubtful that employees will have expertise in complex matters such as antitrust affairs. Additionally, the NRC does not have jurisdiction in antitrust affairs.
3. The regulations are not specific as to what measures an employer may take to refute discrimination allegations by an employee. Certainly employers should be given an opportunity to refute such charges by an employee.
4. Revocation or suspension of a license is too severe a penalty for isolated violations. Such a penalty should be resorted to only in the event of a repetition of violations.

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5. Disgruntled employees are likely to use the regulations as a means of seeking revenge on employers by filing unjust discrimination complaints. The regulations should include sanctions against employees who abuse the regulations. Additionally, employers should have the right to discharge any employee who renders bad faith reports to the Commission.

Respectfully submitted,



Thomas W. Pennington
Senior Corporation Counsel
and Secretary