



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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May Lynn

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MEMORANDUM FOR: Edward L. Halman
Director, Division of Contracts
& Property Management

FROM: James A. Fitzgerald *JAF*
Assistant General Counsel
for Adjudications & Opinions

SUBJECT: PROPOSED NRC ACQUISITION REGULATION

The purpose of this memorandum is to transmit to you our comments on the proposed rule to establish the NRC Acquisition Regulation, which was published in the Federal Register on October 2, 1988, (54 Fed. Reg. 40420). My office has reviewed the rule in the light of the conflict of interest laws applicable to current and former NRC employees. On the basis of that review, we suggest that a separate subpart 2009.1 section containing the following language be substituted for section 2009.100(c) of the proposed rule:

Nothing in this subpart shall be construed as relieving current or former NRC employees from compliance with the requirements of NRC's Conduct of Employees regulations, regulations issued by the Office of Government Ethics, or conflict of interest statutes applicable to current or former Government employees. To help ensure compliance with such requirements, any proposal that states a current NRC employee will be used to perform work under the contract shall be referred to the General Counsel for review.

Please call Susan Fonner (x21632) if you have any questions regarding the above.

cc: Brian Kildee

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NUCLEAR REGULATORY COMMISSION

Documents Containing Reporting or Recordkeeping Requirements:
Office of Management and Budget Review

AGENCY: Nuclear Regulatory Commission

ACTION: Notice of the Office of Management and Budget review
of information collection.

SUMMARY: The Nuclear Regulatory Commission (NRC) has recently submitted
to the Office of Management and Budget (OMB) for review the
following proposal for the collection of information under the
provisions of the Paperwork Reduction Act (44 U.S.C. Chapter
35).

1. Type of submission, new, revision, or extension: New.
2. The title of the information collection:
48 CFR Chapter 20, Nuclear Regulatory Commission
Acquisition Regulation (NRCAR).
3. The form number if applicable: Not applicable.
4. How often the collection is required:
On occasion; one time.
5. Who will be required or asked to report:
Offerors responding to NRC solicitations and contractors
receiving contract awards from NRC.
6. An estimate of the number of responses: 10,045
7. An estimate of the burden per response: 12 hours
8. An estimate of the total number of hours needed to
complete the requirement or request: 115,420
9. An indication of whether section 3504(h), Pub. L. 96-511
applies: Not applicable.
10. Abstract: The NRCAR is necessary to implement and
supplement the government-wide Federal Acquisition
Regulation, and to ensure that the regulations governing
the procurement of goods and services within the NRC
satisfy the needs of the agency.

Copies of the submittal may be inspected or obtained for a fee from the NRC
Public Document Room, 2120 L Street, N.W., Washington, D.C. 20555.

NRC FILE CENTER COPY

Comments and questions can be directed to the OMB reviewer as follows:
Nicolas B. Garcia, Paper Reduction Project (3150 -xxxx), Office of
Management and Budget, Washington, D.C. 20503. Comments can also be
submitted by telephone at (202) 395-3084.

The NRC clearance officer is Brenda Jo Shelton, (301)492-8132.

Dated at Bethesda, Maryland, this _____ day of _____ 1989.

For the Nuclear Regulatory Commission

Joyce A. Amenta, Designated Senior
Official for Information Resources
Management

2NDPAGE;TXTSCOTT

OFFICE:	<i>m&D</i> ADM:DCPM:OSS	<i>A</i> :ADM:DCPM:OSS	<i>mjm</i> :ADM:DCPM:DD	<i>mjm</i> :ADM:DCPM:D	:OGC
SURNAME:	MLScott	:RDThompson	:MJMattia	:ELHalman	<i>for</i> GMizuno
DATE:	8/3/89	:8/3/89	:8/7/89	:8/7/89	:9/25/89

SAIK by phone

OFFICE:	IRM:D	:	:	:	:
SURNAME:	Jamenta	:	:	:	:
DATE:	9/25/89	:	:	:	:

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Request for OMB Review

Important

Read instructions before completing form. Do not use the same SF 83 to request both an Executive Order 12291 review and approval under the Paperwork Reduction Act.

Answer all questions in Part I. If this request is for review under E.O. 12291, complete Part II and sign the regulatory certification. If this request is for approval under the Paperwork Reduction Act and 5 CFR 1320, skip Part II, complete Part III and sign the paperwork certification.

Send three copies of this form, the material to be reviewed, and for paperwork—three copies of the supporting statement, to:

Office of Information and Regulatory Affairs
Office of Management and Budget
Attention: Docket Library, Room 3201
Washington, DC 20503

PART I.—Complete This Part for All Requests.

1. Department/agency and Bureau/office originating request U.S. Nuclear Regulatory Commission (NRC)		2. Agency code 3 1 5 0
3. Name of person who can best answer questions regarding this request Mary Lynn Scott		Telephone number (301) 492-8788
4. Title of information collection or rulemaking 48 CFR Chapter 20 Nuclear Regulatory Commission Acquisition Regulation (NRCAR)		
5. Legal authority for information collection or rule (cite United States Code, Public Law, or Executive Order) USC or OFPP Act of 1974 (Pub. L. 93-400), as amended by P.L. 96-83		
6. Affected public (check all that apply)		
1 <input checked="" type="checkbox"/> Individuals or households	3 <input type="checkbox"/> Farms	5 <input type="checkbox"/> Federal agencies or employees
2 <input checked="" type="checkbox"/> State or local governments	4 <input checked="" type="checkbox"/> Businesses or other for-profit	6 <input checked="" type="checkbox"/> Non-profit institutions
		7 <input checked="" type="checkbox"/> Small business or organizations

PART II.—Complete This Part Only if the Request is for OMB Review Under Executive Order 12291

7. Regulation Identifier Number (RIN) _____ or, None assigned

8. Type of submission (check one in each category)		Type of review requested
Classification	Stage of development	
1 <input type="checkbox"/> Major	1 <input type="checkbox"/> Proposed or draft	1 <input type="checkbox"/> Standard
2 <input type="checkbox"/> Nonmajor	2 <input type="checkbox"/> Final or interim final, with prior proposal	2 <input type="checkbox"/> Pending
	3 <input type="checkbox"/> Final or interim final, without prior proposal	3 <input type="checkbox"/> Emergency
		4 <input type="checkbox"/> Statutory or judicial deadline

9. CFR section affected _____

10. Does this regulation contain reporting or recordkeeping requirements that require OMB approval under the Paperwork Reduction Act and 5 CFR 1320? Yes No

11. If a major rule, is there a regulatory impact analysis attached?
If "No," did OMB waive the analysis? 1 Yes 2 No
3 Yes 4 No

Certification for Regulatory Submissions

In submitting this request for OMB review, the authorized regulatory contact and the program official certify that the requirements of E.O. 12291 and any applicable policy directives have been complied with.

Signature of program official	Date
Signature of authorized regulatory contact	Date

12. (OMB use only)

PART III.—Complete This Part Only if the Request is for Approval of a Collection of Information Under the Paperwork Reduction Act and 5 CFR 1320.

13. Abstract—Describe needs, uses and affected public in 50 words or less "Procurement regulation"
 The NRCAR is necessary to implement and supplement the government-wide Federal Acquisition Regulation, and to ensure that the regulations governing the procurement of goods and services within the NRC satisfy the needs of the agency. The "affected public" are proposers, bidders, and contractors of NRC procurements.

14. Type of information collection (check only one)

Information collections not contained in rules

- 1 Regular submission 2 Emergency submission (certification attached)

Information collections contained in rules

- 3 Existing regulation (no change proposed) 6 Final or interim final without prior NPRM 7. Enter date of expected or actual Federal Register publication at this stage of rulemaking (month, day, year) 10/5/89
 4 Notice of proposed rulemaking (NPRM) A Regular submission
 5 Final. NPRM was previously published B Emergency submission (certification attached)

15. Type of review requested (check only one)

- 1 New collection 4 Reinstatement of a previously approved collection for which approval has expired
 2 Revision of a currently approved collection 5 Existing collection in use without an OMB control number
 3 Extension of the expiration date of a currently approved collection without any change in the substance or in the method of collection

16. Agency report form number(s) (include standard/optional form number(s))

N/A

22. Purpose of information collection (check as many as apply)

- 1 Application for benefits
 2 Program evaluation
 3 General purpose statistics
 4 Regulatory or compliance
 5 Program planning or management
 6 Research
 7 Audit

17. Annual reporting or disclosure burden

1 Number of respondents	750
2 Number of responses per respondent	13
3 Total annual responses (line 1 times line 2)	10,045
4 Hours per response	12
5 Total hours (line 3 times line 4)	115,420

23. Frequency of recordkeeping or reporting (check all that apply)

- 1 Recordkeeping
Reporting
 2 On occasion
 3 Weekly
 4 Monthly
 5 Quarterly
 6 Semi-annually
 7 Annually
 8 Biennially
 9 Other (describe): _____

18. Annual recordkeeping burden

1 Number of recordkeepers	N/A
2 Annual hours per recordkeeper	
3 Total recordkeeping hours (line 1 times line 2)	
4 Recordkeeping retention period	years

19. Total annual burden

1 Requested (line 17-5 plus line 18-3)	1
2 In current OMB inventory	0
3 Difference (line 1 less line 2)	+1
Explanation of difference	
4 Program change	+1
5 Adjustment	

24. Respondents' obligation to comply (check the strongest obligation that applies)

- 1 Voluntary
 2 Required to obtain or retain a benefit
 3 Mandatory

20. Current (most recent) OMB control number or comment number

N/A

21. Requested expiration date

3 years after submission

25. Are the respondents primarily educational agencies or institutions or is the primary purpose of the collection related to Federal education programs? Yes No

26. Does the agency use sampling to select respondents or does the agency recommend or prescribe the use of sampling or statistical analysis by respondents? Yes No

27. Regulatory authority for the information collection

48 CFR Chapter 20 or FR or Other (specify): _____

Paperwork Certification

In submitting this request for OMB approval, the agency head, the senior official or an authorized representative, certifies that the requirements of 5 CFR 1320, the Privacy Act, statistical standards or directives, and any other applicable information policy directives have been complied with.

Signature of program official

Date

Signature of agency head, the senior official or an authorized representative

Date

Joyce A. Ametta, Designated Sr. Official for Information Resources Mgmt.

9/25/89

SUPPORTING STATEMENT
FOR
48 CFR CHAPTER 20

NUCLEAR REGULATORY COMMISSION ACQUISITION REGULATION

Justification

Need for and Practical Utility of the Information Collection

NRC regulations in 48 CFR Chapter 20 implement and supplement the government-wide Federal Acquisition Regulation (FAR), and ensure that the policies governing the procurement of goods and services within the NRC satisfy the needs of the agency. The Nuclear Regulatory Commission Acquisition Regulation includes policies, procedures, solicitation provisions, and contract clauses needed to assure effective, efficient evaluation, negotiation, and administration of procurements.

Section 2015.607 provides that the contracting officer shall require that the proposer's clarification(s) provided in accordance with FAR 15.607 be in writing. This written record is needed to assure that the proposer's true statement of the clarification is provided for reviewers' analyses.

Section 2019.705-4(a) provides that subcontracting plans may be requested from all concerns determined to be in the competitive range for the purpose of negotiations.

Section 2027.305-3 provides procedures for the contracting officer to, as a part of the closeout of a contract, require each contractor to report on any patents, copyrights, or royalties attained using any portion of the contract funds. Federal Acquisition Regulation (FAR) Part 27.305-3 and -4 specify that the agency is to maintain such procedures.

Section 2042.803(a)(2)(i) provides that the contractor may submit a written claim to the Director, Division of Contracts and Property Management as to why a cost disallowed by the contracting officer should be reimbursed. This procedure allows for an informal review of the contracting officer's decision or an alternative to established formal processes.

Section 2052.204-70(i) requires that the subcontractor insert provisions similar to those found in 2052.204-70 (b) through (h) in all subcontracts and purchase orders under the contract, to safeguard classified information.

Section 2052.204-70(j) requires that the contractor assign classifications to all documents, material and equipment originated or generated by the contractor in accordance with classification guidance by the Commission to safeguard classified information.

Section 2052.204-71 requires that all contractor personnel obtain, display, and safeguard identification badges in accordance with agency procedures. Because the NRC is a secure facility with perimeter access control, all NRC employees and contractor employees needing frequent access to the NRC facilities must display current identification badges. All contractors to whom this clause applies must also safeguard classified information and safeguard against unauthorized access of other Government records or data.

Section 2052.209-71 requires the offeror to provide identifying information for each case where any current/former NRC employees have been or will be involved, directly or indirectly, in developing the offer, negotiating on behalf of the offeror, or managing, administering, or performing any contract, consultant agreement or subcontract resulting from the offer. This information is used to assure that conflicts of interest are avoided and fairness is maintained during the selection process.

Section 2052.209-73 For any potential conflict of interest situation as the contracting officer may identify, this section requires the offeror provide a written description of all relevant factors to be considered. This information is necessary to permit NRC to make a fair analysis of such situations. This requirement appears in 41 Code of Federal Regulations Chapter 20, which will be rescinded after publication of 48 CFR Chapter 20.

Section 2052.209-74(d)(2) requires the contractor to make an immediate and full disclosure in writing to the contracting officer if organizational conflicts of interest are discovered after contract award. This requirement appears in 41 Code of Federal Regulations Chapter 20, which will be rescinded after publications of 48 CFR Chapter 20.

Section 2052.209-74(f) requires the contractor to include the clause 2052.209-74 in subcontracts of any tier in order to prevent conflicts of interest that may be generated at those levels. This requirement appears in 41 Code of Federal Regulations Chapter 20, which will be rescinded after publication of 48 CFR Chapter 20.

Section 2052.210-71 provides that all drawings, designs, specifications and other data associated with the contract work are the property of the Government and must be made available for inspection and disposed of in accordance with instructions from the contracting officer. This requirement is necessary to assure that classified, highly sensitive, and high priority specifications and other data are secured throughout the life of the contract and after expiration of the contract. The clause is included in all contracts in which drawings, designs, specifications, or other data will be developed.

Section 2052.212.70 requires that all technical reports and technical progress reports be prepared in accordance with the Nuclear Regulatory Commission Chapter 3202, "Publication of Technical Reports Prepared by NRC Contractors, Including Reports Prepared Under or Pursuant to Interagency Agreements." The clause alerts the offeror to the requirements of the chapter.

Section 2052.212-71 provides the timing and basic content requirements for Technical Progress Reports for the offerors to consider in preparation of a bid or proposal, and for guidance to the contractor. This information is necessary to save time and expense in the contractor's preparation and the NRC's review of these reports.

Section 2052.212-72 provides the timing and basic content requirements for Financial Status Reports for the offers to consider in preparation of a bid or proposal, and for guidance to the contractor. This information is necessary to save time and expense in the contractor's preparation and the NRC's review of these reports.

Section 2052.214-71 requires the bidder to provide identifying information on previous and current contracts for the contracting officer to consider in the determination of responsibility. Determination of responsibility is required by FAR 14.407-2.

Section 2052.214.72(f) requires the bidder to provide, on request, statements concerning their ability to meet any of the minimum standards set forth in FAR 9.104, samples of work, and identifying information on clients.

Sections 2052.214-74 and 215-81 require the offeror to request in writing with the offer that copies of the offers be returned if return is desired. This permits the contracting activity to automatically dispose of extra copies of offers in a timely manner.

Sections 2052.215-71 and -72 provide proposal preparation instructions for offerors' consideration and action. These provisions will permit presentation of proposals consistent with the evaluation criteria, and in a standard format to enhance the ability of evaluators to review the proposals.

Section 2052.215-73 requires the contractor in accordance with FAR 15.406-2(a)(3) to provide the Data Universal Numbering System (DUNS) Number. The DUNS number is used by procurement personnel to consult the Dun and Bradstreet listings for the financial status of proposed contractors.

Section 2052.215-74 requires the contractor to immediately notify the contracting officer if one or more key personnel become unavailable for contract work and, subject to the concurrence of the contracting officer, promptly replace the personnel. This requirement helps assure that the project is managed by competent personnel in accordance with the accepted proposal.

Section 2052.215-77(f) requires the contractor to notify the contracting officer within five days of receipt of any unauthorized technical direction and request a modification to the contract. This requirement can save the delays and expense associated with disputes that might surface at a later time.

Section 2052.216-74 provides instructions for offerors to use in the preparation of proposals for task order contracts and subsequent proposals for task orders. Use of these instructions by proposers will permit the NRC to perform efficient review and take prompt action on the proposals.

Section 2052.235-70 requires the contractor to comply with the requirements of Nuclear Regulatory Commission Manual Chapters 3202, "Publication of Technical Reports Prepared by NRC Contractors, Including Reports Prepared Under or Pursuant to Interagency Agreements," and 3206, "NRC Contractor Unclassified Papers, Journal Articles and Press or Other Media Releases on Regulatory and Technical Subjects." The clause alerts the offeror to the requirements of the chapter concerning oral or written dissemination of information. These requirements are imposed to assure that national security, patent rights, copyrights, proprietary rights and rights in other sensitive unclassified information are not compromised by the release, distribution, or dissemination of technical reports from NRC, or by public statements by the contractors.

Section 2052.235-72 requires the contractor to take all reasonable precautions in the performance of the work under the contract to protect the health and safety of employees and members of the public, and to comply with reporting requirements. This allows the contracting officer, if necessary, to take immediate action to carry out the agency mission to protect the public health and safety.

Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection, assuming that sensitive information can be protected from improper disclosure and that the integrity of the competitive procurement process is maintained. NRC encourages its use wherever possible.

Duplication of Other Collections of Information

The Information Requirements Control Automated System (IRCAS) was searched to identify duplication. None was found. The nature of the collections (proposal data, certifications, and reports of current activity specific to the contract) do not lend themselves to duplication. For evaluation of

proposals, only information conveyed in the proposal may be evaluated to assess the offeror's ability to successfully accomplish the prospective contract. To the extent there is similar information, updating or tailoring to the prospective contract by the offeror would have the effect of reducing the burden.

Effort to Reduce Small Business Burden

The information collection is structured to facilitate the effective and efficient evaluation of proposals, certifications by offerors, and administration of contracts. The burden applied is the minimum consistent with applicable regulations and prudent business practices.

Consequences of Less Frequent Collection

Proposal submission and certifications are basically one-time collections associated with specific contract/solicitation situations or requirements. Less frequent reporting of technical progress and financial status removes an effective mechanism required for maintenance of an aggressive contract remedial action to protect the interests of the Government.

Circumstances Which Justify Variation from OMB Guidelines

The requirement for monthly submission of technical progress and financial status reports is not consistent with 5 CFR 1320.6(a). The circumstances which justify more frequent submission are set forth immediately above.

Consultations Outside the NRC

The following agencies' implementation of the Federal Acquisition Regulation have been consulted: U.S. Department of Energy; U.S. Department of Health and Human Services; U.S. Department of Housing and Urban Development; U.S. Department of Defense; Environment Protection Agency, and others. Individual procurement policy experts in many of these agencies were contacted. In addition, all acquisition proposed or final rules published in the Federal Register since August 1987 have been reviewed.

Confidentiality of Information

To the extent information is proprietary or business confidential, procedures are in place to protect the information from improper disclosure.

Justification for Sensitive Questions

No sensitive information normally considered private or personal is required or requested.

Estimate of Compliance Burden

Reporting Requirements

<u>Section</u>	<u>No. of Respondents</u>	<u>Submittals Annually</u>	<u>Respondent Hrs Per Submittal</u>	<u>Total Annual Respondent Burden</u>
2015.607	750	750	.25	188
2019.705-4(a)	300	300	20	6,000
2027.305-3	300	300	10	3,000
2042.803(a)(2)(f)	10	10	10	100
2052.204-70(i)	100	100	2	200
2052.204-70(j)	10	10	20	200
2052.204-71	20	20	100	2,000
2052.209-71	400	400	2	800
2052.209-73	400	400	.25	100
2052.209-74(d)(2)	1	1	5	5
2052.209-74(f)	400	400	.25	100
2052.210-71	300	300	5	1,500
2052.212-70	300	1,200	.5	600
2052.212-71	300	1,200	4	4,800
2052.212-72	300	900	2	1,800
2052.214-71	400	400	.5	200
2052.214-72(f)	30	30	1	30
2052.214-74 and .215-81	8	8	.25	2
2052.215-71 and -72	750	750	100	75,000
2052.215-73	750	750	.1	75
2052.215-74	10	10	4	40
2052.215-77(f)	10	10	4	40
2052.216-74	100	600	30	18,000
2052.235-70	300	1,200	.5	600
2052.235-72	4	4	10	40
TOTAL		10,045		115,420

There are no recordkeeping requirements.

TOTAL BURDEN HOURS: 115,420
 TOTAL NUMBER OF RESPONDENTS: 750 (seven hundred and fifty companies or individuals, on the average, propose or bid for NRC contracts above \$25,000. The number of contractors with active awards ranges from 300 to 400. Many selections of the proposed regulation apply to only a small number of proposers, bidders, or contractors.)

Cost to Respondents to Comply

<u>Section</u>	<u>Cost</u>
2015.607	15
2019.705-4(a)	1,200
2027.305-3	600
2042.803(a)(2)(i)	600
2052.204-70(i)	120
2052.204-70(j)	1,200
2052.204-71	6,000
2052.209-71	120
2052.209-73	15
2052.209-74(d)(2)	300
2052.209-74(f)	15
2052.210-71	300
2052.212-70	30
2052.212-71	240
2052.212-72	120
2052.214-71	30
2052.214-72(f)	60
2052.214-74	
and .215-81	15
2052.215-71	
and -72	6,000
2052.215-73	6
2052.215-74	240
2052.215-77(f)	240
2052.216-74	1,800
2052.235-70	30
2052.235-72	600
TOTAL:	\$19,881

The total annual industry cost is \$6,925,200 (115,420 hours times \$60 per hour). The estimated annual cost per respondent would be less than \$19,881 (the total for all burden items), but would vary on a case-by-case basis depending on the type of contract, the individual business circumstances, the reporting requirements imposed, and other business and contractual circumstances.

Source of Burden Data and Method for Estimating Cost

The estimates are based on submittals to NRC in past years. Cost to respondents is calculated at a rate of \$60 per hour, which includes overhead.

Estimate of Cost to the Federal Government

Section	Government Staff Hours - Annual	Gov't Cost
2015.607	1500	90,000
2019.705-4(a)	150	9,000
2027.305-3	6000	360,000
2042.803(a)(2)(i)	200	12,000
2052.204-70(i)	10	600
2052.204-70(j)	100	6,000
2052.204-71	2000	120,000
2052.209-71	100	6,000
2052.209-73	100	6,000
2052.209-74(d)(2)	40	2,400
2052.209-74(f)	40	2,400
2052.210-71	150	9,000
2052.212-70	300	18,000
2052.212-71	300	18,000
2052.212-72	450	27,000
2052.214-71	60	3,600
2052.214-72(f)	60	3,600
2052.214-74 and .215-81	8	560
2052.215-71 and -72	2250	135,000
2052.215-73	38	2,280
2052.215-74	20	1,200
2052.215-77(f)	50	3,000
2052.216-74	360	180,000
2052.235-70	120	72,000
2052.235-72	40	24,000
TOTAL	18,158	\$1,111,640

The estimated cost to the agency attributable to this collection is \$1,111,640. The cost to the Government was derived from the experience as to the approximate time contract specialists and program personnel expend in ensuring that offerors comply with the instructions. The collection will require an average of hours of NRC staff time per collection.

Reason for Change in Burden

This proposed regulation includes contract clauses and proposal preparation instructions previously approved under OMB Control Numbers 3150-0112 and 3150-0118 with an associated total annual burden of 84,100 hours. The new burden of 115,420 hours (an increase of 31,320 or 3.1 hours per response) represents additional burden necessary for the Nuclear Regulatory Commission to fully implement the Federal Acquisition Regulation.

Publication for Statistical Use

This collection of information does not employ statistical methods.

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NRC ACQUISITION REGULATION - RECORD OF RESPONSES TO DRAFT DATED MARCH 27, 1989

Addressee	Respondent (If different from Addressee)	No Comments	Non-Substantive Comments	Substantive Comments
William Kerr, Chairman Advisory Committee on Reactor Safeguards	Mabel F. Lee	x		
B. Paul Cotter, Jr., Chairman Atomic Safety and Licensing Board Panel		x		
Christine N. Kohl, Chairman Atomic Safety and Licensing Appeal Panel		x		
Frederick W. Herr, Acting Director Office of Inspector and Auditor			x	
William C. Parler, General Counsel Office of the General Counsel	Hudson B. Ragan			x
Samuel J. Chilk, Secretary Office of the Secretary of the Commission		x		
Ben B. Hayes, Director Office of Investigations			x	
Harold R. Denton, Director Office of Governmental and Public Affairs		x		
Michael Springer, Director Office of Consolidation		x		
James Lieberman, Director Office of Enforcement		x		

MRC ACQUISITION REGULATION - RECORD OF RESPONSES TO DRAFT DATED MARCH 27, 1989

Addressee	Respondent (If different from Addressee)	No Comments	Non-Substantive Comments	Substantive Comments
Edward L. Jordan, Director Office for Analysis and Evaluation of Operational Data	Gina Thompson		x	
William B. Kerr, Director Office of Small and Disadvantaged Business		x		
Paul E. Bird, Director Office of Personnel	Nick Monaco	x		
Robert M. Bernero, Director Office of Nuclear Material Safety and Safeguards	Jesse L. Funches	x		
Thomas E. Murley, Director Office of Nuclear Reactor Regulation	Frank Gillespie			x
Eric S. Beckjord, Director Office of Nuclear Regulatory Research		x		
Joyce A. Amenta, Director Office of Information and Resources Management			x	
Ronald M. Scroggins, Controller Office of the Controller	Graham D. Johnson (Scroggins also responded)			x
Larry P. Cooper, Director Management Support Staff Office of Administration			x	

NRC ACQUISITION REGULATION - RECORD OF RESPONSES TO DRAFT DATED MARCH 27, 1989

Addressee	Respondent (If different from Addressee)	No Comments	Non-Substantive Comments	Substantive Comments
William T. Russell Regional Administrator, Region I		x		
Stewart D. Ebner Regional Administrator, Region II		x		
A. Bert Davis Regional Administrator, Region III	Gen Roy			x
Robert D. Martin Regional Administrator, Region IV	Larry Yandell		x	
John B. Martin Regional Administrator, Region V	Kathleen Hamill		x	