

OCT 19 1989

MEMORANDUM FOR: Stuart A. Treby, Assistant General Counsel
for Rulemaking and Fuel Cycle, OGC

FROM: Richard E. Cunningham, Director
Division of Industrial and
Medical Nuclear Safety, NMSS

SUBJECT: PARENT COMPANY GUARANTOR UNDER 10 CFR 70.25(f)(2)

We are requesting your assistance in responding to a request made by Rockwell International Corporation (copy enclosed) to act as a parent company guarantor for its Rocketdyne Division under 10 CFR 70.25(f)(2). As parent company has not been defined in the regulations, your interpretation as to what defines a parent company is requested.

Although Rocketdyne Division, Rockwell International Corporation, is the specific licensee who has initiated this request, we request broad guidance which can be used for other large companies such as General Electric and Westinghouse. These companies have business operations which are licensed by the NRC, and hence are subject to the same requirements of 10 CFR 70.25. Your assistance in resolving this question is appreciated.

Original Signed By: *John Hackey*

Richard E. Cunningham, Director
Division of Industrial and
Medical Nuclear Safety, NMSS

Enclosure: Ltr dtd 09/13/89

cc: R. Bangart, LLWM
M. Bell, LLWM

Distribution w/o encl.

Docket 70-25	PDR	NRC File Center	NMSS R/F
IMUF R/F	IMSB R/F	VLTharpe	Region RV
CHooper, RV	MHorn	GHBidinger	GSjoblom
IMNS Central File			

OFC:IMUF:	IMUF:	IMUF:	IMSB:	DO/IMNS:	D/IMNS:
NAME:MHorn:mlh:	VLTharpe:	GHBidinger:	LCRouse:	GSjoblom:	RECunningham:
DATE:10/18/89	10/19/89	10/19/89	10/19/89	10/19/89	10/19/89

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