

**Babcock & Wilcox**

DOCKETE  
USNRC

Naval Nuclear Fuel Division

'81 NOV -4

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BRANCH

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License SNM-42  
October 29, 1981



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

Attention: Docketing and Service Branch

Dear Sir:

On September 10, 1981 the U. S. Nuclear Regulatory Commission caused to be published in the Federal Register (46 FR 45144) an Advance Notice of Proposed Rulemaking concerning "Material Control and Accounting Requirements for Facilities Possessing Formula Quantities of SSNM," 20 CFR 70. Comments to this advance notice are due before November 9, 1981.

To objectively comment on the rules published in the advance notice requires extensive review of facility procedures and resources. Additionally, B&W representatives attended a meeting on October 27, 1981, with NRC representatives and other licensees, in which the NRC provided licensees a better understanding of the advance notice. In view of additional information received at this meeting and B&W's desire to provide meaningful comments, we request a 60-day extension of the comment period. This would require comments before January 9, 1982.

Sincerely,

BABCOCK & WILCOX

*R. A. Cordani*

R. A. Cordani  
Manager  
Radiation Safety & Licensing

RAC/bjc

cc: L. J. Evans, Chief  
Regulatory Improvement Branch

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*R. J. Dube*  
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