

6-3-88 e

Note for Jim Lieberman, DE
Don Hassell, OGC

In preparation for our meeting on 6-9-88, please give some thought to the following:

(1) Suggest that 10 CFR 2.205 not use the term "compromise" so as not confuse with the same term as used in the Federal Claims Collection Standards (4 CFR 101-104)

(2) In 10 CFR 2.205, it should be indicated when a "claim" or "debt" arises for debt collection purposes. It would be when an order imposing a civil penalty arises out of 10 CFR 2.205 (c), (d) or (f)

(3) 10 CFR 15.1(b)(2) should cite 10 CFR 2.205 (c), (d), and (f) rather than just 10 CFR 2.205

Seaham Johnson
9001080034 X 27535