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PROPOSED RULE PR- 19 et al

47 FR 52452)
January 3, 1983

Secretary of the Commission Attention Docketing and Service Branch U.S. Nuclear Regulatory Commission Washington, DC 20555

AUTHORITY FOR THE COPYING OF RECORDS AND RETENTION PERIODS FOR SECURITY RECORDS PROPOSED RULE: 10CFR PARTS 19, 21, 30, 40, 50, 70, 71, 73, AND 110 (47 FR 52452), NOVEMBER 22, 1982

We are pleased to submit our comments on the above-mentioned proposed rule.

In cases where the current regulations provide for Commission inspection of records, the proposed rule would also allow the Commission to copy such records. In some instances, these records may contain trade secrets and commercial or financial information which is deemed privileged or confidential by the record holder or owner. Therefore, the protection afforded pursuant to 10CFR2.790 should be applicable to documents copied by the Commission during authorized inspections.

The final rule should reflect language to ensure that records copied by the Commission during an inspection are not subject to public disclosure until the record holder or owner of such records has had the opportunity to submit an application for withholding from public disclosure in accordance with 10CFR2.790.

R. B. Bradbury

Chief Licensing Engineer

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Acknowledged by card 1/12/83 204