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In Reply

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DOCKET NUMBER
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(46 FR 45144)

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

Attn: Docketing & Service Branch.

Subject: FR Docket 81-26463: MC&A Advance Notice of Proposed Rulemaking;
Request for Extension of Comment Period.

Gentlemen:

General Atomic Company is aware of subject notice published in the September 10, 1981 Federal Register. Its staff had begun to develop comments on the questions and the various options raised in the notice. New information was presented at a recent Safeguards Committee meeting held on 10/29/81 which has caused us to reevaluate our comments in this very complex issue. For this and other reasons, one of which is the year end no holiday period, we request that the comment period on the notice be extended by 90 days.

Notwithstanding our above request for an extended comment period and our intent to submit more detailed comments at a later date, we submit below some preliminary comments and suggestions. They are:

1. Material stored in a vault and which is available only to a team of individuals whose identity is known by security personnel should be exempted from daily and weekly quantitative as well as qualitative tests prescribed for materials less vigorously protected and available to unescorted workers within the general processing areas. To impose added vault entries or material movements merely to check the contents of containers is a gross abrasion of the recent physical security upgrade rule's thrust.
2. The 10 CFR 70.87(c)(2)(ii) self test program should be moved such that the test be performed by an audit team thereby allowing them to directly determine the effectiveness of the MC&A system.
3. The physical protection upgrade rule required a variety of procedural elements, redundant checks or over-checks, inspections, etc., to assure that material could not illicitly be removed from a facility by a conspiracy of individuals. The proposed 70.89 as written seems to require redundancy and separate handling of all records involved in the MC&A system. This is an extreme burden upon the myriad of material travelers or process records which

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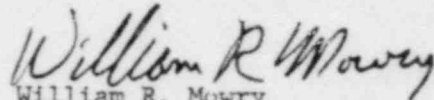
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3. (continued)

document material movement through the processes within any given set material access area boundaries. Sufficient over-checks can be given material to assure that unauthorized material cannot practically be moved outside a given processing facility. Accordingly, the prescribed duplication or redundancy of records within a facility do not make a cost effective contribution to the insider collusion. In our view, 10 CFR 70.89 should be removed or rewritten to apply only to those records involving SSNM removals from a material access area.

We look forward to the opportunity to provide further comments under an extended comment period which considers the intervening year and holiday period.

Very truly yours,



William R. Mowry
Licensing Administration
Nuclear Materials Control Division

WRM:hcs