

PROCTER & GAMBLE  
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Procter & Gamble (58 FR 3515)

The Procter & Gamble Company  
Ivorydale Technical Center  
5299 Spring Grove Avenue, Cincinnati, Ohio 45217-1087

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March 23, 1993

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Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Sir or Madam:

This provides the comments of Procter & Gamble to the proposed amendment to NRC regulations which would allow certain non-electric utility licensees to use self-guarantee as a means of financial assurance of decommissioning costs. This proposal was published in the Federal Register on Monday, January 11, 1993 with comments requested by March 29, 1993.

Procter & Gamble endorses the proposed revisions. When a licensee is financially strong, it is an unnecessary expense and effort to be required to obtain an annual surety bond to cover some future license decommissioning costs. This is especially so when the use of licensed materials is for research and development efforts where decommissioning costs will be limited.

We believe the NRC recognized this when an option in the 1988 regulations permitted a parent company to guarantee for a subsidiary. Yet as issued, the regulations precluded a financially strong parent company from guaranteeing for itself.

We have no difficulty with the financial criteria as proposed; however, we see no sound reason the self-guarantee requirements should be any more stringent than the parent-guarantee requirements.

We do wish to highlight one aspect. It is critical that the wording of II. (3) of the Self-Guarantee Appendix B include the option that the portion of assets in the United States need only be 10 times the estimated decommissioning costs. Otherwise, because of the wording of the first part of (3), a large multinational company such as Procter & Gamble with major and adequate assets in the United States could be excluded from self-guarantee simply because we might have a majority of assets outside

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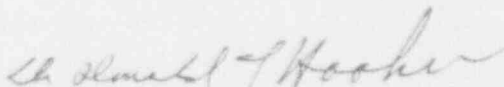
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of the United States. As a suggestion, part (3) could be deleted and part (2) reworded to: (The added words are underlined.)

(2) Tangible net worth and assets located in the United States amounting to at least 10 times the total current decommissioning cost estimate for all decommissioning activities for which the company is responsible as a self-guaranteeing licensee and as parent-guarantor, or the current amount required if certification is used.

We hope the Commission will promptly adopt self-guarantee as an option for financially strong licensees for assuring potential decommissioning costs.

Very truly yours,



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Professional Standards Department  
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