

DS09 - D. Grimsley
S. Baggett
measurex
CORPORATION

JEROME RAFFEL
SENIOR VICE PRESIDENT
MANUFACTURING OPERATIONS

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November 15, 1990

David L. Meyer, Chief
Regulatory Publications Branch
Division of Freedom of Information
and Publications Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Notice in October 16, 1990 Federal Register
re. Public Disclosure of Selected General
Licensee Information

Dear Mr. Meyer:

As a distributor of process control systems to general licensees located throughout the United States, Measurex Corporation is concerned with NRC and Agreement State practices related to general licenses.

Measurex opposes the plan to make general licensee names and addresses available to the public. While regulatory authorities clearly need access to detailed information on general licensees, this information is not of value to members of the public. The information the NRC proposes to release is essentially a list of radioactive material locations. Even though the quantities and forms of radioactive material are such that they present a very limited hazard, common sense strongly suggests that a list of radioactive material locations be released only to those who have a legitimate need for the information.

In discussing this issue briefly with Michael Lesar of the NRC, it was suggested that this proposed action was consistent with the NRC's desire to strengthen control over general licensees. If the desire to tighten control of general licensees IS part of the motivation for the proposed action, Measurex submits that the present regulations governing general licensees are fully adequate. Control problems arise when the

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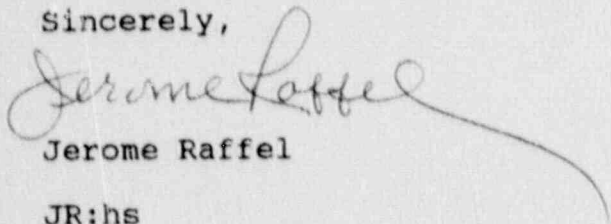
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existing regulations are not consistently enforced. Adding new regulations or making a list of general licensees available to the public will not contribute to increased safety or better regulatory control.

Finally, but not least important, we note that suppliers of generally licensed devices consider their customer lists to be trade secrets. Such is the case at Measurex. Similarly, purchasers of these devices often consider information on their equipment acquisitions to be confidential and require suppliers to sign nondisclosure agreements. The October 16, 1990 NRC notice in the Federal Register implies that no confidential information would be made public. As described above, Measurex strongly objects to the proposed action. If, however, the NRC does proceed with making general licensee data available, Measurex wishes to emphasize the importance of limiting the information to no more than customer names and addresses.

Sincerely,



Jerome Raffel

JR:hs

cc: Donnie Grimsley NRC
Elsa Nimmo Measurex
Charles Van Orden Measurex