

**WM-6**  
**PDR**  
 (Return to WM, 623-SS)

NOV 5 1982

WMPI: 414.1.1

MEMORANDUM FOR: Leland C. Rouse, Chief  
 Advanced Fuel & Spent Fuel  
 Licensing Branch

FROM: Joseph O. Bunting, Jr., Chief  
 Licensing Process & Integration Branch

SUBJECT: ACRS PARTICIPATION IN NRC RULEMAKING AND POLICY  
 MAKING ACTIVITIES

We have two comments regarding the revised MOU. First, with regards to timing, the new MOU puts the ACRS on the critical path and adds at least four months to the process. Depending on how the stronger role is exercised (identified in Number 3), additional time may be added. This extra time could be reduced by having the ACRS and CRGR do their reviews in parallel instead of series.

Second, the new administrative steps add specific requirements that increase paperwork. Is this consistent with the Paperwork Reduction Program?

*101*  
 Joseph O. Bunting, Jr., Chief  
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 Subject File  
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