AC 91-1
PDR

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 13, 1990 ~~Mark F~~/Joe Mate

For your files and action.
Sher
10/14

MEMORANDUM FOR: Sher Bahadur, Chief
Regulatory Development Branch
Division of Regulatory Applications, RES

FROM: Thomas M. Novak, Director
Division of Safety Programs, AEOD

SUBJECT: PUBLIC COMMENTS ON THE PROPOSED RULE, NOTIFICATION OF INCIDENTS

Comments on the public comments are as follows:

1. Comment 7, page 2. In the past, OGC has been opposed to including generic requirements in license conditions since that route avoids the rulemaking process. OGC might be able to frame a response to the comment in terms of regulatory perspective.

2. Comment 10, page 3. This comment seems to be quite similar in part to question 7 and perhaps the response should be tied back to 7.

3. Comment 48, page 9. 'One working day' seems to be a definitive period. The virtue of going to a working day may be that licensees working a five-day week can more easily comply with the regulation for events that occur late in the day on Friday.

4. Comments 65 and 67, page 12. The answers to these comments appear to disagree with each other. For 65, the statement is made that all medical facilities will have to report whereas the response to comment 67 states that NRC could exempt certain facilities that have contamination controls in place. These answers should be reworded so that the response to comment 65 refers to the response to question 67 if NRC is going to grant exemptions.

IF you have any questions, please contact Kathleen M. Black of my staff on X24495.

Thomas M. Novak, Director
Division of Safety Programs, AEOD

cc: J. Mate, RES

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Thomas M. Novak, Director
Division of Safety Programs, AEOD

cc: J. Mate, RES

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Fm: J. Mates

From: K. Black

2 pages (includes cover)

Nov. 9, 1990

MEMORANDUM FOR: Sher Bahadur, Chief
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