

EXXON NUCLEAR COMPANY, Inc.

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DOCKET NUMBER

PROPOSED RULE

(49 FR 8583)

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USNRC

May 31, 1984

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

OFFICE OF THE
DOCKETING & SERVICE
BRANCH

Attention: Docketing and Service Branch

Gentlemen:

Reference: General Statement of Policy and Procedure for Enforcement
Actions (49 FR 8583, March 8, 1984).

Exxon Nuclear Company, Inc. has the following comments on the revised
general statement of policy referenced above.

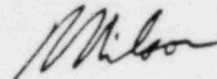
We approve that the Commission has directed that an in-depth study of the
enforcement program be performed by a small committee of individuals from
outside the NRC. It will be of great interest to see what conclusions this
group arrives at on the relevancy of the existing enforcement policy (which
relies heavily on civil penalties) to real improvements in public health
and safety.

We question the increase in the basic civil penalty for safeguards viola-
tions for low-enriched fuel fabrication plants. No basis is given in the
notice for this increase and the ratio of penalties for non-Category I to
Category I violations is extreme compared to relative safeguards risks of
the two categories of material.

We call your attention to an error in Supplement III, Section B.4 where a
failure involving a formula quantity of SNM is labeled as a Severity II
violation. In the current regulations, this failure is stated to involve a
formula quantity of SSNM, not SNM.

We appreciate the opportunity to comment on this policy.

Sincerely yours,



R. Nilson, Manager
Corporate Licensing

clc

DS10

add: Jane A. Axelrad, 359 EWW
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Notified by email

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AN AFFILIATE OF EXXON CORPORATION

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