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JUL 29 1983

MEMORANDUM FOR: Patricia G. Norry, Director
Office of Administration

FROM: Learned W. Barry, Director
Office of Resource Management

SUBJECT: FINAL RULE CHANGES FOR 10 CFR 170

I concur with your draft rule as distributed on July 11, 1983. My office has had extensive conversations with Bill Miller on this document. Our joint efforts to devise a uniform system for the collection of contractual costs (both commercial contracts and DOE work) are not affected by the rule. ADP for the information system (TAPPS) and both contractor and NRC-internal reporting of costs will be required under any version of the rule the Commission approves.

The draft Bulletin 0803 - appended to the rule reads: "Agency records will not permit reporting voluntary overtime by employees." This should be changed to note that fees cannot be based on voluntary overtime - but not to "deny" the ability to report voluntary overtime.

Original signed by
Ronald M. Scroggins

Learned W. Barry, Director
Office of Resource Management

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