

October 7, 1992

MEMORANDUM FOR: The Chairman  
Commissioner Rogers  
Commissioner Curtiss  
Commissioner Remick  
Commissioner de Planque

FROM: James M. Taylor  
Executive Director for Operations

SUBJECT: NUMARC APRIL 28, 1992, LETTER ON 10 CFR PART 50, APP. J

Enclosed is a letter from the Nuclear Management and Resources Council (NUMARC) with comments on the general revision to the subject regulation, currently before the Commission as SECY 91-348.

Also enclosed are some NRC staff views on the NUMARC letter and its contents. As stated in Enclosure 2, the NRC staff believes that Commission approval for publication of the revision is the preferred course of action and that any further relaxation and reduction of regulatory burden desired by NUMARC be pursued in the NRC initiative to eliminate requirements marginal to safety. Furthermore, there is concern that to adopt the bulk of the late-arriving NUMARC comments would likely cause a reissue for public comment. Therefore, I support this recommendation to proceed with publication.

The enclosed views as they pertain to the backfit rule and publication have been coordinated with OGC.

Original Signed By:

James M. Taylor  
James M. Taylor  
Executive Director  
for Operations

Enclosures:

1. NUMARC ltr dtd 4/28/92
2. Discussion of NUMARC 4/28/92 ltr
3. NUMARC ltr dtd 3/6/92 w/partial enclosures

cc: W. Parler, OGC M. Malsch, OGC SECY

CONTACTS:

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OGC	DD:RES	D:RES	D:RRR	DD:EDO	EDO	* See previous sheets
MMalsch*	TSpeis	EBeckjord	JMurley	JSnizek	JTaylor	for concurrences.
6/09/92	7/10/92	7/14/92	8/1/92	8/1/92	10/1/92	△ Concurrence
						rechecked on 7/17/92

*G. Arndt*  
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*2705*  
*11*

ENCLOSURE 1

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