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PROPOSED RULE

PR 30, 40, 50, 60, 70, 72, 150
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U.S. Nuclear Regulatory
Commission, Secretary
Washington D.C. 20555

OFFICE OF THE
DOCKETING & SERVICE
BRANCH

Attention: Docketing & Service Branch

Ref: RIN 3150-AD21

Proposed rule - Preserving the free flow of information
to the Commission.

It is my opinion that the proposed rule is unnecessary
because it is redundant. Existing laws and regulations already
provide for the free flow of information to government agencies.

The way to solve this problem is not to bury it in paper.

The idea that it will "not impose any substantial costs on
licensees or license applicants" is simply not true. Every piece
of paper we are required to prepare, file, update, sign or read
adds to the cost of doing business.

I see no evidence in the proposal document that indicates
any improvement in the safety of individuals is to be gained by a
series of documents which are, in effect, promises to obey the
regulation.

If the Commission feels that existing laws and regulations
do not adequately cover the issue, a simple performance based
regulation might be in order.

I suggest the following opening language for paragraph 30.7
(g)(1).

No licensee, contractor, or sub contractor of a licensee
shall impose, etc.

Paragraph (g)(2) then becomes superfluous, as does all the
paperwork.

An analogy which comes to mind is that of the stop sign.
The rules say I must stop at a stop sign, but I am not required
to promise in writing that I will do so, nor am I required to get
written agreements from my spouse, my children and my
mother-in-law that they, too, will stop.

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P 510

Each of us, whether receiving a drivers license or a nuclear materials license accepts the rules that apply. There is no need for the additional paperwork.

Very truly yours,

A handwritten signature in cursive script, reading "Paul E. Sieck".

Paul E. Sieck
V.P. Manufacturing

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