

Commissioner McGaffigan's Comments on SECY-99-014

I approve the staff's rulemaking plan and commend the staff for this initiative, which will reduce unnecessary conservatism with minimal risk impact, and possibly even risk reduction. This initiative should be added to the Chairman's Tasking Memo, especially since it is likely that this may be defined as a "major rule," in this case due to a greater than \$100 million positive impact. We should also include this rulemaking in our annual letter to OIRA about major rulemakings expected to be issued in final form in the upcoming fiscal year. Based on the safety benefits inherent in the instrument upgrades and the potential cost/burden benefits to licensees, this effort should be expedited with the goal of submission of the proposed rule to the Commission in 5 months. Until this rule is finalized, the staff should not delay processing properly supported requests for exemptions.