

Performance Technology

P.O. Box 51663, Knoxville, Tennessee 37950-1663 Phone: (423) 588-1444, Fax (423) 584-3043
performtech@compuserve.com

November 9, 1999

Mr. Frank Akstulewicz
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Dear Mr. Akstulewicz:

With reference to my October 7, 1999, letter to the NRC Commissioners that has been referred to you for action, I believe it is appropriate to treat the part of the letter that suggested specific changes to 10CFR50.44 and 10CFR50, Appendix A, General Design Criteria 41, as a request for proposed rulemaking. Please initiate the appropriate actions to start such a process.

With respect to any action concerning "Option 3" of SECY 98-300, I personally believe it would be advantageous to make sure that Dr. Tom King of the NRC Office of Research and the people responsible for "Option 3" are aware of my proposed changes to the NRC rules mentioned above and whatever actions that NRR personnel might be taking on this matter. If this can be accomplished in an effective manner, I believe that it should be done, but I leave it to your discretion.

If you have any questions about this matter, please call me. I hope to be in Rockville part of the week of November 29th and would like to arrange a meeting with you and Mr. David Meyer during this time at your convenience.

Sincerely,



Bob Christie

cc: Tom King
David Meyer