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October 12, 1999

OFFICE  
OF THE  
ADMINISTRATIVE

Secretary

U.S. Nuclear Regulatory Commission

Washington D. C. 20555-0001

Attention: Rulemakings and Adjudications Staff

DOCKET NUMBER

PROPOSED RULE **PR 30,31,32 170+171**  
**(64FR40295)**

Reference: Proposed Rule 64 FR 40295; July 26, 1999

Dear Secretary,

I was at the meeting held on Friday, October 1, 1999. My comments to several of the points brought out at that meeting are on record. I firmly believe, as I stated in that meeting that Self-Luminous Exit Signs do not belong in Part 31.5.

Unlike the other devices that are listed in 31.5, Self-Luminous Exit Signs save lives and energy. We estimate there are currently close to a million such signs in use in North America. The number of incidents that are recorded as a percentage of these signs in use is negligible. It is our understanding that even the most recent incidents in New Jersey, where juveniles stole self-luminous signs from a construction site and unlawfully dismantled them, resulted in a radiological dose to the individuals involved that was nil or below background levels.

I therefore believe that Self-Luminous Exit Signs should be exempt from general license requirements. The 25 year history of these signs supports this conclusion.

Very Truly Yours,



Larry Harmon  
Plant Manager

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