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From: <jrbradshaw@aep.com>
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Subject: 10 CFR Part 26 Comments on Collection Procedure

September 27, 2005 (11:23am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

This comment is from:

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Comment is on part:

28.67f. (3) A collector of the same gender as the donor.....

COMMENT: Why does the collector have to be of the same gender? Obviously this is required for an observed collection, but the normal collection process when a donor is within an enclosed stall does not require the same gender, as the individual is not in the direct presence of the donor, visual privacy is maintained by the enclosure.

To require the same gender puts an undue burden on the licensee's as they would be required to have both genders at ALL collections. Normally this is not required except for observed collections. During outage processing with multiple sites going this could present (albeit temporarily) even more of a disruption moving collectors to different sites, or maintaining male-female collection sites. This has not been an issue presently, and we do not see where there is increased benefit to require it in this rule.

Comment on:

Part 26.91 c. (2) Assigns a unique number to each completed test, which the collector and donor can read BEFORE each test and which is printed on each copy of the test result.

Our units currently do not read out BEFORE each test, but is printed on the print out. Why does it have to be before each test if it is on the print-out record? To require a read-out before each test will require the purchase of new CBT units, when currently the units we use are on the approved list.

END COMMENTS:

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