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PETITION RULE PIRM-71-7(43FR25749)
4 August 1978

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn:

Docketing and Service Branch

Re:

Appendix E, 10CFR, Pt 71, Transportation QA program proposal,

Gentlemen,

As a manufacturer of portable nuclear devices using sealed sources of small value, we wish to protest adoption of Appendix E with its increased QA requirements for the transportation of nuclear materials.

It is almost impossible at the present time to keep abreast of the myriad rules and regulations pertaining to transportation of "hazardous" materials. It is equally impossible to maintain a reasonable cost level in attempting to keep abreast.

If our firm were a much larger firm we might afford a full time radiation safety expert whose time would be devoted to insuring compliance with regulations. This would be an expensive drag on our productive effort merely to insure compliance with bureaucracy!

Our clients are much further down the line in this matter. They use the equipment to produce revenue in their firms, however, they are far from being nuclear experts or transportation experts. It is essential that we maintain a simple posture with such users of low value, sealed source devices or we negate the entire attempt at industrial development of safe and peaceful use of nuclear isotopes.

The adoption of Appendix E would result in a dramatic increase in worthless paperwork for each shipment of materials and would eventually trickle down to the user of a lone, 10 millicurie source, who would be utterly incapable of providing the required QA for each shipment of a gauge to his next worksite, or to the factory for repair, or, perhaps merely from his office to the day's routine test site locally.

No definitive requirement has been demonstrated for the increased QA requirement. Why do we need it? Is this just another regulation to keep busy?

Our industry was not contacted regarding the possible side effects of this additional regulation. It could be disastrous to us, yet incurred without discussion.

Patrick J. Campbell, President

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Acknowledged by card, 8/14 S.S.

