

# YUBA HEAT TRANSFER CORPORATION

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August 9, 1978

DOCKET NUMBER

(27)

PETITION RULE PRM-71-743FR25749



Mr. Samuel Chilk  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C., 20555

Dear Mr. Chilk:

I would like to make the following comments on the petition contained in the Federal Register and dated June 14, 1978, (Docket No. PRM-71-7, Non-Destructive Testing Management Association, ETAL).

I fail to see the justification for 10CFR, Part 71, Appendix E, since we neither manufacture nor repair shipping packages. When we transport any radioactive material we do so in accordance with our Nuclear Regulatory Commission License, and the Manufacturers' Instruction.

In view of the apparent lack of justification for Appendix E, and in view of the large increase in cost, not only to the industry but also to the N.R.C., I feel compelled to request that the petition filed by the NDTMA be approved and Appendix E to 10CFR, Part 71, be removed.

Very truly yours,

YUBA HEAT TRANSFER CORPORATION

E. L. McCarthy  
President

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ELMc:cd

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Acknowledged by card...

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