



NEBRASKA TESTING LABORATORIES

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PETITION RULE PRM-71-7(43FR25749)

Omaha, Nebraska 68106

August 11, 1978

Dan E. McCarthy
President

George Phelps
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Vice-President

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

Re: Proposed Appendix E of 10 CFR, Part 71

Dear Mr. Chilk:

We would like to take this opportunity to comment on the petition contained in the Federal Register of June 14, 1978 [Docket No. PRM-71-7, Non-Destructive Testing Management Association, ET AL].

We generally concur with the petition, particularly with respect to its necessity. We realize the purpose of the NRC and the associated executive rules are intended to protect the safety and well-being of the populace. However, we fail to understand how this new regulation will effectively help protect the safety of the populace. Most people realize that a regulation requires an expenditure of time and money to implement, maintain and enforce. Where this inflationary cost can be passed on to tax payers in the case of Government, and where the cost can be passed on to customers in the case of medium to large manufacturers or service companies, the small company is forced to absorb much of the cost in order to remain competitive. There are all too many regulations that are useless, wasteful, and/or unenforced. Why should another one be added?

We respectfully request that Appendix E be removed from 10 CFR, Part 71. However, we shall make every effort to comply if there is no alternative. We certainly hope that you and your associates will be available to offer assistance in answering the questions which will arise.

Although we are but one voice, and a small one at that, we hope that you will take the time to consider our opinions and request.

Respectfully,

Dan E. McCarthy
Daniel E. McCarthy
President

Donald F. Stevens
Donald F. Stevens, Director
Non-Destructive Evaluation

DFS/jmk

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