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PETITION RULE PRM-71-7(43FR25749)

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

Pan American World Airways, Inc.
Aerospace Services Division
Occupational Medicine and Environmental
Health Unit
Kennedy Space Center, Florida 32809



Dear Mr. Chilk:

We wish to comment on the petition contained in the Federal Register dated 14 June 1978 (Docket No. PRM-71-7, NON DESTRUCTIVE TESTING MANAGEMENT ASSOCIATION, ET AL).

Despite the fact that the various notices referring to the proposed implementation of changes to 10 CFR, Part 71, requiring licensees to develop Q. A. programs to implement the provisions of Appendix E of Part 71, we feel the Commission did not consider the impact of implementation on the licensees.

It would seem apparent that the implementation of Appendix E criteria will impose a tremendous financial burden on all licensees.

The industry "track record" of major incidents involving radioactive materials in transport simply does not warrant the additional requirements proposed.

Investigation of the few major incidents in the past involving radioactive materials would indicate noncompliance on the part of some individual(s) of already existing adequate hazardous materials transport regulations.

Instead of developing more broad and all encompassing regulations, it would seem more appropriate for the Commission and the Department of Transportation to: (1) conduct pertinent educational seminars to assist those in the industry who are not familiar with existing regulations, and (2) provide more meaningful compliance inspections to ensure adherence to those regulations which currently exist.

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We would, therefore, like to request that the Commission reconsider the proposed changes to Part 71 with regard to need versus impact.

Very truly yours,

R. K. Mancini
Louis Ray Urciuolo
Senior Health Physicist
Pan American World Airways
Radiation Protection Officer

RKM/dlh

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