

ULTRASONIC SPECIALISTS, INC.

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DOCKET NUMBER

PETITION RULE PRM -71-7(43FR 25749) August 11, 1978



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

Attention: DOCKETING & SERVICE BRANCH

Dear Mr. Chilk:

As an employer and manager of a Non-Destructive Testing firm using radio active material, I would like to comment on the petition in the Federal Register dated June 14, 1978 (Docket #PRM 71-7 NDT Management Association ET AL).

Our company was not aware as were most of the companies on the Gulf Coast Area of the item Appendix E of 10 CFR, Part 71, therefore, we must be in complete support of the above petition dated June 14, 1978.

We ask " WHY DO WE NEED MORE REGULATIONS ". We must go along with the petition that this item has been forced on the industry without proper discussion or proof of necessity.

I ask the question as to what forced the U. S. Nuclear Regulatory Commission to pass such a rule. It is apparent to all concerned that even the U. S. Nuclear Regulatory Commission cannot keep up with all the regulations much less members of the industry who do not have the financial backing of the government to support them.

In view of the lack of justification for Appendix E to Part 71 and in view of the lack of necessity for this monstrosity, and the apparent large increase in cost and effort it will place upon the industry. I feel compelled to support the Petition.

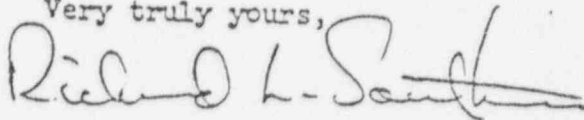
I feel additional regulations are needed but at the State Level and not N.R.C.. We are presently corresponding with the State of Texas to stiffen the requirements for license applicants. This we hope will control the fly-by-night companies that are hurting the industry.

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I ask you for the immediate removal of Appendix E to 10 CFR, Part 71.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Richard L. Southers". The signature is fluid and cursive, with the first name "Richard" and last name "Southers" clearly legible.

Richard L. Southers
Radiation Safety Officer

RLS:C1

cc: Senator John Tower

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