



Basin Surveys, Inc.

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August 7, 1978

DOCKET NUMBER

PETITION RULE PRM-71-7(43,FR25749)

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



Dear Mr. Chilk:

I wish to comment on the petition contained in the Federal Register and dated June 14, 1978 (Docket No. PRM-71-7, Non Destructive Testing Management Association, ET AL).

Since neither I nor most of my colleagues were aware of the item Appendix E of 10CFR, Part 71, we must go along with the petition that this item has been forced on the industry without discussion or proof of necessity.

Although the petition is issued by the Non Destructive Testing Management Association, the Part 71, Appendix E refers to the industry as a whole and it would make me derelict if I did not raise the question as to what forced the U. S. Nuclear Regulatory Commission to pass such a rule.

Quoting from a paper issued by Mr. MacDonald, Mr. Goda and Mr. Barker, all employees of the U. S. Nuclear Regulatory Commission and apparently all active in the justification of Appendix E to Part 71, we call your attention to page 5 and the History. "The packaging and transportation of Radioactive Materials is exemplary." If this is the case why must you add more regulations.

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 millions of dollars of government waste to support them.

Presently it takes many months for your licensing people to process even an amendment and we have been advised that a streamlining of licensing would correct the problem. Appendix E to Part 71 is simply adding more burden.

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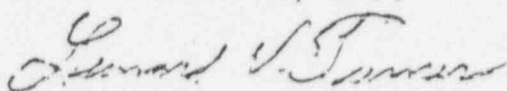
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In view of the lack of justification for Appendix E to Part 71 and in view of the lack of necessity for this monstrosity, the apparent large increase in cost and effort it will place upon the industry, we feel compelled to support the petition.

This company and its management request the immediate removal of Appendix E to 10CFR Part 71.

Very truly yours,

BASIN SURVEYS, INC.



Leonard V. Turner
Radiation Safety Officer

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LVT/md