

DRESSER INDUSTRIES, INC., EXECUTIVE OFFICES: DRESSER BUILDING * ELM AT AKARD * DALLAS, TEXAS 75221

LAW DEPARTMENT

DOCKET NUMBER

PETITION FILE PRM-71-7 (43FR25749)

August 14, 1978



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

Re: Appendix E of Part 71 - Quality Assurance Program

Dear Mr. Secretary:

The purpose of this letter to you is to express our support for the petition filed by the Non-Destructive Testing Management Association [Docket No. PRM-71-7].

This petition, published at 43 Fed. Reg. 25750 (June 14, 1978), calls for the revocation of Appendix E of 10 CFR 71. Appendix E requires the approval and implementation of quality assurance programs for the packaging and transportation of radioactive material in Class B quantities.

Dresser Atlas, a division of Dresser Industries, Inc., uses radioactive sources in Class A quantities for a major part of its petroleum exploration services, well bore neutron logging. These sources are manufactured by our suppliers from inventories of radioactive materials received in Class B quantities.

While our Class A sources are not directly affected by Appendix E, the increased paperwork and administrative costs resulting from the implementation of such quality assurance programs would, of necessity, increase the cost of sources manufactured from Class B quantities. And this requirement could, on occasion, delay the transportation, handling and manufacture of such sources for delivery to final end-users such as Dresser Atlas.

In addition to - and perhaps even more important than - the foregoing specific concern to Dresser Atlas, is our general concern that Appendix E requirements are, yet again, another example of unjustified regulations that require needless paperwork. As the NRC has pointed out in its background history to Appendix E, past packaging and transportation of radioactive materials has been exemplary.

It is extremely unlikely that any benefit would ever be derived from the promulgation of Appendix E; the drawbacks, however, are readily apparent.

8001140 335

90021298

Acknowledged by card. 8/25

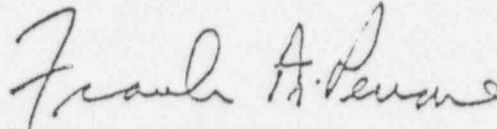
Secretary of the Commission
August 14, 1978

DRESSER INDUSTRIES, INC.

Page Two

On all accounts, the revocation of Appendix E before the effective date of January 1, 1979, would be in the public interest.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank A. Perrone". The signature is fluid and cursive, with the first name "Frank" being more prominent.

FRANK A. PERRONE
Attorney
Government/Business Affairs

FAP:tbp

90021299