



NUCLEAR ENERGY SERVICES, INC. PROJECT NUMBER

CONAM INSPECTION DIVISION

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FILE PRM-71-2(43FR25749

June 1, 1978

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U.S. Nuclear Regulatory Commission
Division of Fuel Cycle and Material Safety
Transportation Branch
Washington, D.C. 20555

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NRC MAIL SECTION



Attention: Charles E. McDonald, Chief

Reference: 10 CFR, Part 71 (Q.A.)

Dear Sir:

The purpose of this letter is to request an extension of the July 1, deadline for submission of the Quality Assurance program required by Part 71.

I feel an extension is essential and would create no hazard of over exposure to any segment of the population.

I myself and, I am sure others in the industry, have many questions regarding the proposed QA requirement that need clarification.

My first question is the necessity for users to develop a QA program. We do indeed ship and transport radioactive material, but our activities are in accordance with written practices, contained in our operating and emergency manual (NRC approved).

My second question is the value of the QA program. The majority of sources shipped in interstate commerce, are those returned to the supplier and most are less than 20 curies and in special form (type A quantities) and seem to be exempt from QA requirements.

I am in favor of a quality assurance program covering the manufacture, repair, design, assembly, testing and maintenance of containers, but the use of containers would seem to fall within the scope of licensed activities and is well regulated at the present time. I am quite familiar with most published radiation incidents and fail to see justification for the program to include users.

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One final problem I have, is the effect on transportation within agreement states and shipments from agreement states into NRC states. I hope you will agree a six months extension is in order.

Yours sincerely,

OTIS C. GAMBLE
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Radiation Safety Officer

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