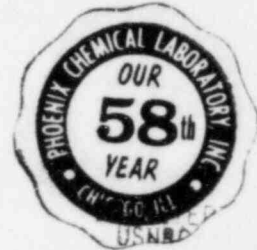


Phoenix Chemical Laboratory, Inc.

FUEL AND LUBRICANT TECHNOLOGISTS
3953 SHAKESPEARE AVENUE
CHICAGO, ILL. 60647



July 22, 1985

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

OFFICE OF DELIVERABLES
DOCKETING & SERVICE
BRANCH

Attention: Docketing and Service Branch

Re: Financial Responsibility
Requirements Applicable
to NRC Licensees for
Clean-Up of Accidental
and Unexpected Releases
of Radioactive Materials

Gentlemen,

Licensees whose use of by-products is limited to sealed sources of the type used in electron capture detectors should be exempted from the proposed financial responsibility requirements for the following reasons:

- (1) Sources of the subject type are sealed and release of by-products is extremely unlikely.
- (2) The amounts of by-product involved are very small.
- (3) Licenses for such by-product use require the licensee to keep the by-product containing device intact and prohibit opening of the device.
- (4) Licenses for such by-product use require the licensee to return the by-product containing device to the manufacturer for disposal.

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Acknowledged by card

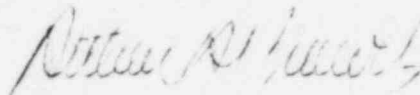
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- (5) Ni⁶³ devices are regularly monitored for leakage by means of wipe tests.
- (6) Proposed financial responsibility requirements appear to be excessive in view of the extremely limited risk of any release of by-product material from the subject devices. Said requirements would impose an extreme financial hardship on small companies which routinely use gas chromatographic instrumentation containing by-product material in electron capture detectors which are part of such systems.

Your attention and favorable action with regard to these comments will be greatly appreciated, not only by the undersigned, but by hundreds, if not thousands, of other users of similar equipment.

Respectfully yours,



Arthur A. Krawetz