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TRIAD

BUCKET NUMBER

PROPOSED RULE **PR-30,40,61 et al (13)**
(50 FR 23960)

July 17, 1985

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

DOCKETED
USNRC

Attention: Docketing and Service Branch

*85 JUL 24 A10.35

Subject: Nuclear Clean-Up

Gentlemen:

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH


We are concerned about the Financial Responsibility Requirements Applicable to NRC Licensees for Cleanup of Accidental and Unexpected Releases of Radioactive Materials, and this letter is indicating our concern. We have several Troxler Nuclear Gauges used for testing soils and asphalt, and the sources for most of our gauges is Cesium 137 (8.1 mCi) and Americium 241: Beryllium (40 mCi). These materials are generally enclosed as a relatively small sealed source, and we do not have any specific idea of the cost for a cleanup of the nuclear material if there were damages to a gauge. However, we believe the possible damages to these types of gauges could only create minimal contamination hazard, which could probably be cleaned up very quickly as long as the source is still sealed. We are interested in obtaining information about possible insurance coverage if this regulation goes into affect and, specifically, the cost of this insurance.

Triad Engineering Consultants, Inc. is a relatively small firm that is generally in a very tight financial condition, and another costly insurance policy could adversely affect the firm.

If you have any additional information on this, please let us know.

Very truly yours,

TRIAD ENGINEERING CONSULTANTS, INC.


Dennis C. Chambers, P.E.
Radiation Protection Officer

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Acknowledged by card

JUL 26 1985