

THE APPLIED RADIANT ENERGY CORP.



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*Division 10*  
*FC 403-4*

May 6, 1985

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

Attention: Docketing and Service Branch

Subject: Comments on Draft Regulatory  
Guide and Value/Impact Statement  
Dated - January, 1985

Gentlemen:

We recognize that the filing of these comments is being provided later than the due date of April 1, 1985, however, we are hopeful that they may still be of use in the revision of the proposed regulatory guide.

Our comment primarily is aimed at Item #6 - Purpose For Which Licensed Material Will Be Used. We suggest that this proposed requirement be revised. In particular, the statement "for purposes of public health and safety, you should include a statement that explosives, flammables and corrosives will not be irradiated".

There are many flammable materials which are normally irradiated in the course of standard irradiation procedures. These would include cardboard containers, wood and certain plastics. There is no way in which they can be eliminated from any commercial application of radiation processing. In our own operations, we have irradiated, safely, approximately 20,000 tons of wood and plastic during the past eighteen years or so of operation. It would appear that the appropriate places for covering the potential of flammable materials becoming a source of fire be covered under design descriptions and operational procedures to be employed. In our particular case, materials are always irradiated within sealed canisters and under low oxygen cover gases.

We have no other comments to offer at this time.

Very truly yours,

THE APPLIED RADIANT ENERGY CORP.

*Lawrence G. Barrett*

Lawrence G. Barrett  
President

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