

DOCKET NUMBER

PROPOSED RULE

PR-30,40,61 et al ⑥  
(50 FR 23960)



# INDUSTRIAL INSPECTION AND TESTING SERVICE

P. O. Box 311, Rt. 84, Fulton, Illinois 61252 — Phone (815) 589-2412 — 24 Hrs.

Non-destructive Testing, ASME, API, and other specifications



85 JUL 22 AM 49

JULY 18, 1985

DOCKETING AND SERVICE  
BRANCH

SECRETARY OF THE COMMISSION  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON D.C. 20555

ATTN: DOCKETING AND SERVICE BRANCH

GENTLEMEN:

THIS IS IN REPLY TO YOUR ANPRM CONCERNING REQUIRING PROOF  
OF FINANCIAL ABILITY TO CLEAN UP RELEASES OF NUCLEAR MATERIAL.

FIRST, AS YOU POINT OUT IN THE NOTICE, ONLY LESS THAN ONE  
PER CENT OF LICENSEES ARE INVOLVED IN SUCH INCIDENTS. IT SEEMS  
AN UNNECESSARY BURDEN ON THE OVER 99% TO REQUIRE SUCH AN EXPENSE.  
ALSO, MANY SMALL BUSINESS CONCERNS ARE USING SEALED SOURCES IN  
INDUSTRIAL RADIOGRAPHY WITH AN INFINITESIMAL CHANCE OF LEAKAGE,  
BUT WILL BE GROUPED BY THE INSURANCE COMPANIES WITH THOSE WITH  
HIGH LIABILITY. THIS CAN CAUSE AN ADDITIONAL UNFAIR BURDEN ON  
SMALL BUSINESS(SEE LETTER ENCLOSED REGARDING DEFINITION OF SMALL  
BUSINESS).

WE ARE OPPOSED TO SUCH ACTION AS AN UNNECESSARY EXPENSE.

SINCERELY,

INDUSTRIAL INSPECTION AND TESTING SERVICE

*Rex H. Winget*

REX H. WINGET  
RSO

ENCLOSURE

RHW/RG

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PDR PR  
30 50FR23960 PDR

NON-DESTRUCTIVE TESTING — METALLURGICAL CONSULTATION  
WELD & WELDER CERTIFICATION — WELD PROCEDURES

JUL 22 1985

Acknowledged by #877

*pd*

*DS Add Mary Jo Seaman 62355*