

DOCKET NUMBER

PROPOSED RULE

PR - Misc. Notice
(Reg. Guide)

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USAPPC

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

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Attention: Mr. J. Brown

Gentlemen:

Re: Comments on Draft Regulatory Guide

1. Guide for the Preparation of Applications for Licenses for the Use of Radioactive Materials in Leak-Testing Services *Table EC 412-4*
2. Guide for the Preparation of Applications for Licenses for the Use of Radioactive Materials in Servicing Preregistered Gauges, Measuring Devices, and Sealed Sources Used in Such Devices *Table EC 413-4*
3. Guide for the Preparation of Applications for Licenses for the Use of Radioactive Materials in Calibrating Radiation Survey and Monitoring Instruments *Table EC 413-4*

The suggested guides do not use SI units, thus are an impediment to voluntary metrication and likely to become obsolete very soon. Adequate SI-metric units should be used.

Specifically Reference 1, page 12, uses "mr" which is, to the best of my knowledge, an undefined symbol. (Roentgen? (R?) Rad? Rem?). The symbol for hour is "h". (See ASTM E-380).

The Curie should be replaced by sievert (Sv). Also, the combination of an exponent and the prefix micro are confusing. An exponent should be used with the base unit; a prefix should be used with a number in the range 0.1 to 1000.

Reference 2, page 13, as above $r = ?$ and hours should be "h." Page 11, Section 20.1, uses $1-1/4$, $18-3/4$, and $7-1/2$. These are cumbersome, often confusing, and sometimes ambiguous; metric (and other) notations prefer decimal fractions thus 1.25, 18.75, and 7.5.

Reference 3, page 6, same as above, but uses "R" on page 6 and "r" on pages 11 and 13. Item 6 point 1. uses .01, preferred notation is 0.01, less possibility for mistakes. Page 10 - fractions as above.

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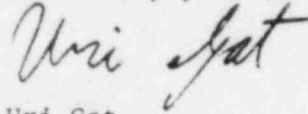
Mr. J. Brown

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8 July 1985

All three references require 8 1/2 x 11 inch paper. Room should be given for metric paper (A series) and metric dimensions.

Metrically yours,

A handwritten signature in cursive script, appearing to read "Uri Gat".

Uri Gat

UG:vm