



STATE NUMBER
PROPOSED RULE
TEXAS
NUCLEAR
A SUBSIDIARY OF RAMSEY
ENGINEERING

PR-30,40,61 et al.
(58 FR 23960) (22)

DOCKETED
USNRC

July 29, 1985

'85 AUG -1 A10:36

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

OFFICE OF SECRETARY
DOCKETING SERVICE
BRANCH

Attn: Docketing and Service Branch

Reference: Financial Responsibility Requirements Applicable to NRC Licensees
for Cleanup of Accidental and Unexpected Releases of Radioactive
Materials

Gentlemen:

The purpose of this letter is to object to your including users of fixed
gauging devices in your proposed rules concerning financial responsibility
requirements.

Almost all gauging devices contain radioactive material in the form of sealed
sources. The majority of these sources are doubly encapsulated in stainless
steel and meet special form requirements. In our 20 years of distributing
industrial gauges, we have never had a sealed source fail or disperse
radioactive material. We have had gauges in fires, explosions, caustic
environments, etc. and the integrity of the source has never been violated.

The likelihood of an incident involving industrial gauging devices resulting
in significant cleanup cost is almost nonexistent. Many gauge users are
small facilities--often times with single gauges. Therefore, to place this
group of users into a broad-based financial responsibility requirement would
be placing on them an unwarranted financial burden with no commensurate benefit
to public health and safety.

Thank you for your consideration.

Sincerely,

TEXAS NUCLEAR CORPORATION

Doris C. Bryan

Doris C. Bryan
Manager
Licensing & Regulatory Affairs

8508020372 850729
PDR PR
30 50FR23960 PDR

DCB/Imv

AUG - 1 1985

Acknowledged by card.....

pd

*1/0
add: Mary Jo Sumner, 62355*