

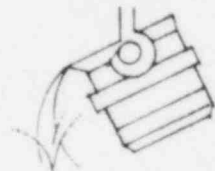
DOCKET NUMBER

PROPOSED RULE

R-30,40,61 et al.

(50 FR 23960)

(131)

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October 3, 1985

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Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Service BranchOFFICE OF THE
GENERAL INVESTIGATOR
BRANCHSubject: Comments on specific considerations on
proposed rulemaking ANPRM.

1. Due to the slump in the steel industry, to add a financial burden in the cost of insurance or a 100% coverage for clean up of an accidental release would cause financial hardship when this industry is trying to get back on its feet. An increase in license fees to cover an insurance cost would be of greater help to all licensees.

2.

(a) The amount and half life should have a greater amount of coverage.

Encapsulation of sources where the test by manufacturing and NRC approved that after being damaged will not cause leaking should have a lesser amount of coverage.

Apurement site should also have lesser amount of coverage since most of the contamination would be restricted more so than field sites.

(b) Effect would upon the final cost of what average would be needed for clean up. Also, what would be recommended by the NRC.

(c) An increase in license fees, part of which would be put into an insurance fund for clean up, would be of greater value to all.

(d) Yes. Half life of less than thirty days and microcuries only.

(e) Yes. The odds for this type of situation would be much higher when unsafe procedures are used.

(f) Have a fund to cover all.

(g) Trust or insurance funds.

(m) Could have an annual statement from every license on financial status thus determining which requirements would be used if using a sliding scale for financial responsibility.

(n) Yes.

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Sincerely,

Gene R. Gamer

NDT Supervisor

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