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STATE BOARD OF HEALTH
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August 1, 1985

Secretary of the Commission
Attention: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Re: Comments on ANPRM

Thank you for allowing me to comment on the ANPRM for the NRC Licensees Financial Responsibility Requirements. I have reviewed carefully all of the submitted material and I remain unconvinced that a valid cost/benefit study would favor this rule.

Aside from this general comment, I am concerned that gas chromatography (GC) users would be included. This agency has used a variety of GC instruments for over 20 years and has had one contamination problem where we assumed that a chemist let the temperature of a nickel-63 source greatly exceed specifications. This contamination was confined to the source holder. As a long time member of the Conference of Radiation Control Program Directors as well as having a close working relationship with a great many institutional radiation protection officers, I believe I would hear if any significant number of gas chromatography sources contaminated facilities to the extent requiring outside consultants to effect the decontamination.

Please consider exempting gas chromatography sources from this rule.

It has been a pleasure to work with the Commission for more than 20 years.

Sincerely,

Hal S. Stocks

Hal S. Stocks, Chief
Radiological Health Section
Division of Industrial Hygiene
and Radiological Health
AC 317/633-0152

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