



JACKET NUMBER

RULE PR-30,40,61 et al.
(50 FR 23960) (144)

November 4, 1985



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

Attention: Docketing and Service Branch

Dear Sirs:

I wish to make some comments regarding 10 CFR Parts 30, 40, 61, 70 and 72--Financial Responsibility Requirements.

We are a small engineering testing firm which uses small, very low level, nuclear devices to test soil and rock fills on construction projects. These devices, referred to as Troxler gages, have sealed sources and we have never had any releases of radioactive material from them. There are thousands of these units in use by other engineering companies, highway departments and contractors. I have never heard of any cleanup problems associated with them. Therefore, I believe that these testing devices should be exempt from the proposed regulations.

We can supply further details on these units, but I refer you to the Troxler Company in the Triangle Research Park near Raleigh, North Carolina.

Very truly yours,

ALPHA-OMEGA GEOTECH, INC.

Roy J. Leonard, Ph.D., P.E.

8511110248 851104
PDR PR
30 50FR23960 PDR

RJL/ez

DS10
add: Mary Jo Suman, 62355
William Albrecht, 9601 MBL
1/0

Alpha-Omega Geotech, Inc.
3825 Fairbanks Road • P.O. Box 6347
Kansas City, Kansas 66106

913/371-0000

Acknowledged by card.....

NOV - 7 1985