

DOCKET NUMBER

PETITION RULE PRM-71-7(43FR25749)

(36)

10 Rice Ct.
Rockville, Md. 20850
September 25, 1978



TP
821-3

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

Dear Sir:

The Federal Register Vol. 43, No. 179, dated Thursday, September 14, 1978, item 7590-01, related to a petition for rulemaking, Docket No. PRM 7 - 1. The petitioner is Mr. Walter P. Peeples, Jr. acting on behalf of the Nondestructive Management Association.

Essentially the petitioner requests the Commission to establish a review board to review all pertinent NRC regulations prior to issuance of new regulations.

I agree with the petitioner's reasons for the need to review regulations. However, establishing a Commission review board is an unnecessary addition to the increasing staff of the Commission and should not be employed to clarify industry positions prior to issuance of a regulation. This staff function or overview board would be expensive to the taxpayer, would add to the regulatory confusion, and may result in conflict of interest concerns. Industry, through the ASME or similar organization, should establish their own review board for this purpose. Such a review board could then work through the ACRS to assure their concerns regarding regulations are adequately considered before the regulation is issued. Regulatory Guides should be treated in the same manner.

Thank you for this opportunity to comment.

John I. Riesland
John I. Riesland, PE

Acknowledged by card. 9/28 S.S.

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