

Northminster Presbyterian Church

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Paul L. Rhodes, Pastor

September 15, 1999

Secretary
U. S. Nuclear Regulatory Comm.
Washington, DC 20555-0001

DOCKET NUMBER
PROPOSED RULE **PR** 30,31,32, 170+171
(64FR40295)

Gentlemen:

This letter is in response to the two notices of rulemaking being proposed by your Commission relative to "Requirements for Those Who Possess Certain Industrial Devices Containing Byproduct Material, etc" which would require periodic reporting and payment of fees. Proposed rule changes would appear in 10CFR Part 31 RIN 3150 - AG06 and 10CFR Parts 30, 31, 32, 170 and 171, RIN 3150 -AG03.

In the interests of simplifying the administrative burden such rulemaking would impose on the Commission, and to lessen its impact on small, non-commercial users of such devices, we respectfully request that an additional provision be incorporated in both rules that will provide:

1. That it does not apply to non-commercial enterprises, including churches and other religious institutions who employ less than 7 such devices, when such devices are limited exclusively to self-luminous exit signs.
2. Enterprises which meet the requirements of exception 1 above will receive from the Commission annual notices relative to the proper maintenance, transfer and ultimate disposal of such devices, but without requiring the payment of any fee.

In justification for the above, we would like to advise that in the case of Northminster Presbyterian Church, the self-luminous exit signs were specifically required to be installed by our local Fire Marshall. Ours is a small Church with slightly over 100 members, and a very tight budget. Any new governmental fees such as envisioned by the proposed rules would impose a burden upon us. We believe that the proposed exception is reasonable, and respectfully request that you give it serious consideration, advising us of your decision.

For the Session

Leander P. Tori Jr.
Leander P. Tori Jr.
Administration Committee

cc:Pastor Paul L. Rhodes

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