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OFFICE
ADJUTANT

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

Attn: Rulemaking

Dear Rulemaking Office,

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

This letter is in response to your Aug. 12, 1999 mailing to General Licensees concerning proposed rulemaking requiring a response to this mailing.

My comments are as follows:

pg40302 Summary of proposed provisions by paragraph

Sec31.1 and Sec31.2 --both state the purpose is to clarify which parts apply to general licensees.....my response would be put all of the items that apply to a general licensee in one place so that a booklet can be given to a general licensee by the NRC or manufacturer and the general licensee will have all the information necessary in one place.

Sec31.5c9i the person having authority to take required action....this is a very broad statement....this should be a management person as in EPA permits or OSHA std a certified statement is required by a president/owner/etc.

Pg40304 Specific questions

- 1. Registration should include a deadline**
- 2. I am not sure I understand this but when the annual re-registration is done all devices should be on that list even if a new device was received days before.**
- 3. I would think most general licensees are small businesses, to have a second person responsible may not be realistic. Management is ultimately responsible and the people listed should reflect that fact.**
- 4. A distributor should assure itself and it's responsibility to the NRC and the general public that a general licensee has all the necessary information and is in compliance before the device is shipped. This can be done by the certification statement made by the president/owner that compliance is achieved the device can be sent. Similar to an EPA permit which requires everything be done before a process starts.**
- 5. It appears this is redundant. The agency already requires the distributor to keep lists and the agency has access to those lists why does it need another database of the same information.**

Sincerely,

Tony Passalacqua

Template = Secy 067

Acknowledged by email

Secy02