

TN Technologies Inc.

DOCKETED
USNRC

July 26, 1999

DOCKET NUMBER
PROPOSED RULE **PR 20**
(64FR35090)

'99 JUL 30 A11:23

Secretary

United States Nuclear Regulatory Commission

Washington, D. C. 20555

OFFICE OF SECRETARY
RULEMAKING STAFF
ADJUDICATION STAFF

SUBJECT: COMMENTS ON RELEASE OF SOLID MATERIALS AT LICENSED FACILITIES

Dear Sir or Madam;

Although TN Technologies Inc. is a large industrial gauge manufacturer and not a nuclear facility we have several comments, on above subject, for your consideration.

1. A.1.2(a) Solid materials potentially available for release.

This category of licensees should be specifically exempted from any proposed release criteria. These new criteria should only apply to A.1.2(b)(3).

2. A.1.2(b)(2) Areas where licensed radioactive material is used or stored.

This wording appears confusing. It does not distinguish loose from sealed radioactive materials. More proper wording would be "Areas where licensed quantities of unsealed radioactive materials are used or stored." This will delineate it from A.1.2(a) and the same wording should be used through out as in A.2.2(3).

3. Issue 2 c (1)

the importance of being able to measure the various nuclides at levels which would result in specified annual doses is crucial to this entire exercise. It would be foolish to try to establish an annual dose limit which could not be detected "reasonably" at the time of release.

Should you have any further questions or require additional information, please advise. I can be contacted by telephone: 512.388.9287, fax: 512.388.9333 or email: rhey@tn-technologies.com.

Sincerely,

Ralph S. Heyer

Radiation Safety Officer

and Manager Regulatory Affairs

Acknowledged by card

AUG - 5 1999

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2555 North I.H. 35 t Post Office Box 800 t Round Rock, Texas 78680-0800

July 29, 1999

NOTE TO: Emile Julian
Chief, Docketing and Services Branch

FROM: Carol Gallagher
ADM, DAS

SUBJECT: DOCKETING OF COMMENT ON RELEASE OF SOLID MATERIALS AT
LICENSED FACILITIES: ISSUES PAPER, SCOPING PROCESS FOR
ENVIRONMENTAL ISSUES, AND NOTICE OF PUBLIC MEETINGS

Attached for docketing is a comment letter related to the subject proposed rule. This comment was received via e-mail July 26, 1999. The submitter's name is Ralph S. Heyer, 2555 North I.H. 35, Post Office Box 800, Round Rock, Texas 78680-0800. Please send a copy of the docketed comment to Frank Cardile (mail stop T9-F-31) for his records.

Attachment:
As stated

cc w/o attachment:
Frank Cardile