



**CTL ENGINEERING INC.**  
 CONSULTING ENGINEERS  
 TESTING • INSPECTION  
 LABORATORY SERVICES

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*F. Kramlich, Jr., Ph.D., P.E.*  
 Chairman of the Board & General Manager  
*D. B. Warner, P.E.*  
 President & Marketing Manager

OBJECT NUMBER **10**  
 PROPOSED RULE **PR-9(44FR 22746)**

May 8, 1979



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

Attention Docking and Service Branch

Reference: Proposed Rule Making/10 CFR Part 9  
 Request for Specific Comments (4) 4-23-79

Gentlemen:

We would sincerely appreciate "plain-English" revision to the following additional regulations:

10 CFR Part 19, 20, 21, 30, 33, 34, 71, 110 and 170

As an interim (or alternate) measure to promulgating "plain-English" revisions, we suggest a toll-free telephone service where a "plain-English" interpretation can be obtained followed by confirmation in writing, if requested. Callers should be allowed to remain anonymous if they so desire, and information supplied by the service published; similar to the public meeting (NUREG-0495) and other (NUREG-0322, etc.) reports.

We feel that "plain-English" revisions and a toll-free service would be of great benefit to licensee's, their employees and to persons not accustomed to USNRC Regulations, radiation or application of standards to the use of radioisotopes (eg., manufacturing and industry personnel responsible for contracting and utilizing radiographic services of an independent testing service, State, County or City safety personnel, insurance underwriters, etc.

The USNRC would also be better served as misinterpretations and oversights in the current "legalese-language" regulations are eliminated.

Your consideration of our comments will be appreciated.

Respectfully submitted,

CTL ENGINEERING, INC.

Acknowledged by card 5/22

JLC:sk

James L. Crowley  
 Director of NDE Services

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- Membership Participation
- AAPT  ACI  ACIL  ACS  AGC  ASCE  ASFE  ASM  ASNT  ASTM  AWS
  - BOCA  CSI  NSPE  OACE  ORMCA  SME  WAC  L  WEI

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