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~~PROPOSED RULE~~ PR-9 (25)  
44 FR 22746

June 6, 1979

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

Attention: Docketing & Service Branch

Gentlemen:

SUBJECT: "Plain English" Revision of F-01A Rule



We offer the following comments to the advance notice of the NRC proposed "Plain English" revision of freedom of information act rule:

- (1) Is it written in a way which can be readily understood by the general public?

Any person who has a specific need or desire for the available information could probably understand the regulation well enough to find a way through the labyrinth of bureaucratic procedures, rules and requirements to request the information as proposed.

We don't know who you perceive the "general public" to be, but it is probable "they" would not understand it.

- (2) Does the organization and format make it possible for the public to determine how to make a freedom of information act request and what the procedures are for an NRC response?

The "public" probably could not make such a determination. Someone with a particular need or desire could.

- (3) Are there specific changes in style, organization, format or substance which would make the revised rule, as proposed, easier to understand.

No (2)  
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Added to file on 6-21-79

- (4) Does the revised rule, as proposed, represent a significant enough increase in clarity, when compared to the present rule, to warrant a further expenditure of public funds to clarify other NRC regulations?

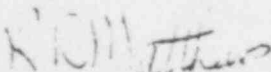
No

- (5) Are there other sections or parts of the Commission's regulations that are particularly difficult to understand or ambiguous?

The Quality Assurance requirements in 10 CFR Part 71 are particularly difficult to understand, especially when applied to industrial radiography. It is a complete duplication of paperwork because all of the organizational information, all of the container certification, all handling instructions, radiation survey requirements, record keeping, personnel qualifications and training, audits, and shipping instructions are covered in great detail in the NRC license to conduct an industrial radiography operation. The same information must be resubmitted to another bureaucracy within the NRC to comply with Quality Assurance. The QA Program serves no useful purpose nor does it improve the quality of industrial radiography. Despite the required acceptance of "final responsibility", there is absolutely nothing a licensee can do to assure quality of a shipping container or its radioactive source until he receives it. Then it's too late to talk about quality. We can only take precautions, and these are detailed in our license. If there are defects, reporting of these are covered by 10 CFR Part 21. Shipping instructions are also covered in license procedures. We believe that safeguards are adequately covered in 10 CFR Parts 19, 20, 21, 30, 34 and 71 to assure safe conduct of industrial radiography and to assure minimal exposure to radiation, whether receiving, using storing or shipping radioactive sources.

We believe the Quality Assurance requirements of 10 CFR Part 71 should only be applied to serve a practical and useful purpose. For Industrial Radiography it only duplicates bureaucracy and paperwork.

Yours truly,



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RDM/RLGlick/sam

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