

NL McCullough

June 14, 1979

Samuel J. Chilk,
Secretary of the Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch



Dear Sir:

We have the following comments in reference to the petition for rulemaking filed by Mr. Walter P. Peeples Jr., on behalf of Gulf Nuclear, Inc.

The need for a separate regulatory body to control non-fissile materials has long been evident among licensees concerned solely with nuclear by-products.

It is apparent that unnecessary expenditures are involved when a by-products user comes into compliance with regulations designed to encompass fissile materials. Comparing the relative dangers of the two types, these expenditures constitutes an inordinant hardship for by-product users.

Not to be ignored is the adverse public sentiment regarding nuclear power production which by association, has had a debilitating effect on by-product users. The NRC can take the lead in educating the public, concerning the distinctions between fissile materials and by-products, and the apparent, just step, would be to issue separate regulations for by-product users.

This move would, of course, result in far less misinterpretation, and therefore, enable more rapid compliance.

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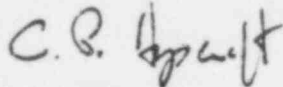
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NL McCullough is in complete agreement with Mr. Walter P. Peeples, Jr., in regards to this petition.

Sincerely,



C.P. Hopcraft
Manager Logging Services
NL McCULLOUGH, NL INDUSTRIES, INC.

CP/de

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