

# RIO ALGOM CORPORATION

## Lisbon Mine

P. O. Box 610  
MOAB, UTAH 84532

Phone: (801) 686-2211

NRC PUBLIC DOCUMENT ROOM  
June 6, 1979

DOCKET NUMBER

PROPOSED RULE

PR-9 (24)

44 FR 22746

Mr. J. M. Felton, Director  
Division of Rules and Records  
Office of Administration  
Nuclear Regulatory Commission  
Washington, D. C. 20555

Re: "Plain English"  
N.R.C. Revision

Dear Mr. Felton:

I have circulated your April 23rd communication on the above mentioned subject to those persons in our organization that have the rather arduous task of maintaining the plant in compliance and spending time in interpreting the new rules and/or regulations that are being fed out at, what some people consider, an alarming rate.

Lack of clarity and apparent repetition sometimes insinuates a subtle change. It is terribly difficult to wade through some of these documents after lunch on a warm afternoon.

To save time and possibly lose some of the flavor of the comments I received, I thought I would take the liberty of sending you complete, unedited comments which are the thoughts of my people and for which the Corporation accepts no responsibility!



Yours sincerely,

M. D. Lawton  
President

MDL:jm

cc: J. Burnett  
R. Pattison  
T. R. Sullivan

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Acknowledged by card 6:21:79 web

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COMMENTS

Page 1 - Request for Comments

Item 4 - When did "charity" ever enter into rule making? "Charity" is the greatest over "faith" and "hope".

If a person was really interested and had the time to read the regulations, he could probably understand them.

T. R. Sullivan

COMMENTS

1. Too repetitive. The contents of the cover letter signed by J. M. Felton also appear on Page 1 and 2 releases and twice again as "summary" and "supplementary information".
2. Having lived with acronyms since before radar, we need more consistent abbreviations. "N.R.C." is defined in the definitions, but is used many times ahead of the definition. Everyone looking at the documents already knows of the of the N.R.C anyway. Conversely, "FOIA" is used frequently and also "Freedom of Information Act". If FOIA were used consistently, the text would be shortened considerably. Also, "PDR" - just after getting accustomed to PDR's we find out there are Local PDR's, but again it is spelled out, insulting our new bit of intelligence.

We can all get by without CFR, NRC, FOIA, PDR, E.O. 12044, and 12065 (easily remembered abbreviations) being spelled out after the first time.

3. Subpart A and Subpart B are there, but Subpart C and Subpart D got lost along the way. (See Par. 9, then look for them!) Stick to the organization and format originally spelled out in Par. 9.
4. There is bound to be conflict between the FOIA and the Privacy Act and the Sunshine Act. Just tell what is available and how to get it. The N.R.C. already has a bad enough image on the things that are not available to the public

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5. There are many other sections and parts of the N.R.C.'s regulations that are difficult to understand and ambiguous because they cannot be understood and interpreted by the normally intelligent layman. A Part 20, proposed rule, is a prime example. It says in effect, that if you have areas of radiation which exceed 0.5 mr. per hour and have employees working in these areas whose radiation exposure may exceed 25% of permissible limit of 1250 mr. per quarter then "appropriate" dosimetry must be provided. We agree wholeheartedly with this interpretation and promptly discarded our TLD badge dosimetry system. There is a lot more in the proposed rule concerning reporting and record keeping that doesn't amount to much as long as you do not exceed the 25% limit.

The entire Part 19 CFR should be rewritten to eliminate all the gobble-de-gook.

J. T. Burnett

COMMENTS

I concur with Bob Sullivan. Otherwise the only comment I have is to question why it is necessary for them to repeat themselves so many times.

R. S. Pattison