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NUCLEAR REACTOR LABORATORY NUCLEAR ENGINEERING DEPARTMENT PHONE 252-3392, REA CODE 608 ADDRESS: 130 MECHANICAL ENGINEERING BUILDING MADISON, A SCONSIN 53706

June 5, 1979

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

Attention: Docketing and Service Branch

Subject: Comment on Proposed Revision 1 to Regulatory Guide 5.7

Dear Sirs:

The last sentence in subject regulatory guide revision indicates the guide is applicable to facilities other than nuclear power reactors. It is not clear how this guide will fit in with proposed revisions to the regulation pertaining to research reactors and the associated regulatory guide. In particular, the proposed 10 CFR 73.47 (which makes specific mention of research reactor facilities) and proposed Regulatory Guide 5.XX do not appear to identify precisely the same requirements as proposed revision 1 to Regulatory Guide 5.7. I believe the statement in the introduction should indicate applicability of this regutory guide with greater clarity.

Very truly yours,

R. J. Cashwell

Manager, Nuclear Reactor Laboratories

RJC:mld



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