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DOCKET NUMBER

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May 25, 1979

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

Attention: Docketing and Services Branch

Subject: 44 FR, 28896
Gulf Nuclear, Inc. Petition

Dear Sir:

Based on a familiarity with both areas of comment (ie, Fissile materials vs. Byproduct), the petition is without merit on the following basis:

1. The fees of application, amendment and inspection associated with byproduct materials are minimal in comparison to those for fissile materials.
2. The byproduct fees are almost entirely representative of benefit to the licensee. The large fees associated with fissile material licensing and inspection activities are much more to the benefit of the Federal Government and the general public than to the licensee.
3. The career doses for radiation exposure to workers terminating in the period 1969 - 1977 is almost equal in terms of man-rem between the nuclear power reactor sites and industrial radiographers per NUREG-0463 (Occupational Radiation Exposure - Tenth Annual Report 1977).
4. The infrequent high radiation exposures are almost always associated with improper use of byproduct materials.

Thank you for this opportunity to comment.

Very truly yours,

William F. Kirk

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