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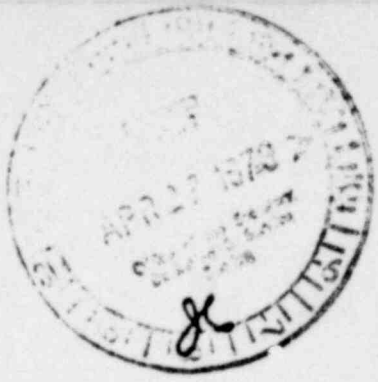

(53)
PROPOSED RULE - 19,20 (44FR10388)

April 23, 1979

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

Attn: Docketing and Service Branch

Dear Sir:

I wish to comment on the proposed changes to 10 CFR Parts 19 and 20 as published in the Federal Register on Page 10388 of February 20, 1979.

In general, I support the proposed changes. However, I have some concern about the effect on certain other regulations and about the possibility of having non-uniform regulations from state to state.

The LFE Corporation employs people in a number of states some of which are Agreement States. In addition, some of the employees work in both Agreement States and non-Agreement States. Without uniform regulations in all states, administration of a radiation program becomes very difficult. I recommend that the Commission work with the Agreement States to phase in the new regulations simultaneously in all states.

My other concern involves general licensees. Part 32.51(a) specifies the radiation dose applicable to general licensees as 10 percent of the limits of 20.101(a). In the proposed regulations, 20.101(a) disappears. Therefore, it appears that 32.51(a) must be amended.

Very truly yours,

LFE CORPORATION
PROCESS CONTROL DIVISION

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William R. Prendergast
Radiation Safety Officer

Acknowledged

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