

# Nucleonic Data Systems

A subsidiary of Gould Inc.

May 26, 1978

DOCKET NUMBER

PROPOSED RULE

3  
PR-110(43FR19861)



SECRETARY,  
U.S. NUCLEAR REGULATORY COMMISSION  
Washington, D.C. 20555

ATTN: DOCKETING AND SERVICE BRANCH

Dear Sir:

I am writing to comment on the proposed rule published in the Federal Register, Vo. 43, No. 90 - Tuesday May 9, 1978, and labelled 7590-01 Export of Certain Minor Quantities of Nuclear Material.

I strongly urge that you consider an exception to the rule revoking the general license for the export of Americium-241. When Am-241 is encapsulated for use as a gamma ray source, as, for example, in a nucleonic thickness gauge, it's neutron output is extremely small. This method of encapsulation renders Am-241 useless as a neutron source for weapons applications.

Therefore, I recommend that you add to section 110.21 a section c)

c) Americium-241 when encapsulated as a gamma ray source.

This, or some similar wording, will afford the proper protection against weapons uses of Am-241 sources, while permitting the export of sealed Am-241 gamma ray sources in strengths to five curies per source.

The United States is a leader in the field of nucleonic thickness gauges and Nucleonic Data Systems is a major gauge manufacturer. Our products have found wide acceptance abroad as well as domestically. The proposed regulation revoking the general license for export of Am-241 would be a serious impediment to our ability to deliver gauging instruments and support our installed equipment. We would be put at a serious disadvantage vis a vis European or Japanese nucleonic gauge manufacturers.

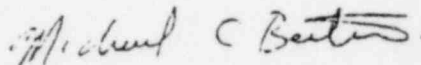
Acknowledged by card... *S.S.*

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I hope this expression of concern will persuade you to grant the general license. Please feel free to call on me if further inputs are needed.

Very truly yours,  
NUCLEONIC DATA SYSTEMS, INC.



Michael C. Bertin, Ph.D.  
Director of Engineering

MCB:kp

cc: R. Harman, Radiation Safety Officer  
J. Prebicin, General Manager  
G. Serra, President