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July 14, 1978

(21)

Mr. James R. Shea, Director
Office of International Programs
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

DOCKET NUMBER
PROPOSED RULE PR-110 (43FR19861)

Re: Export Regulations Draft

Dear Mr. Shea:

We are manufacturers of specialty radiation products for the research and industrial market and export from time to time certain items not exempted or generally licensed by the NRC. These are small amounts of Po-210 and the transuranic elements listed in the enclosed catalog, whose final use is primarily for the purpose of calibration of nuclear instrumentation in research laboratories. We must of course apply for an export license for each order even though the quantity may be minute and the sales price less than $200. We have found in some cases the administrative costs of export actually exceeded the selling price.

Our applications for export licenses have never been questioned or denie so we feel justified in proposing that an additional paragraph be added to Section 110 as follows:

> A general license authorizing any person to export up to one curie per shipment of SNM and byproduct material with atomic number 84 or greater in the form of calibration standards and sealed sources to be used in commercial gaging and x-ray fluorescence instrumentation.

This would still allow the export under general license of small quantities of Po-210 and Am-241. Since this activity is much smaller than the 50 curies corresponding to 3 grams of SNM (as Pu-238) mentioned in paragraph 100.23 we believe there would be no significant threat to national security.

The small scientific specialty companies who manufacture nuclear, chemical and pharmaceutical products are finding themselves besieged by new Federal regulations which were primarily designed to protect the public from the possibility of large or catastrophic exposures to various nucl and chemical agents. These small companies offer valuable services to the research and industrial community and ultimately to the general pub Some of our own products are unique and not commercially available elsewhere to the best of our knowledge. The continued application of unrealistic regulations covering use and transportation of small and relatively harmless quantities of hazardous material is bound to result in eventual curtailment or withdrawal of many of these products from the market.

Acknowledged by card 7/21

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Mr. James R. Shea, Director
U. S. NUCLEAR REGULATORY COMMISSION

I urge that you give serious consideration to more flexible applicatior of current export policy along the lines suggested above.

Sincerely yours,

ISOTOPE PRODUCTS LABORATORIES

Karl Amlauer,
President

KA/rb
Enc. (catalog)