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DCS

PR-61

(43 FR 4781)

8005190632

April 24, 1980

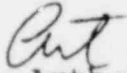
Mr. G. W. Roles
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Gary,

I have reviewed the preliminary draft of 10CFR61 you gave me in Tucson and my comments are attached. I hope they will be of benefit in the evolution of these regulations.

If I can be of any help in the future, please do not hesitate to ask.

Best wishes,


Dr. Arthur A. Sutherland, Jr.

/mps

Attachment

Attachment A

Page 2 Last Paragraph	Should "controlled" be more clearly defined?
Page 5 5th Paragraph	May want to be more precise as to what constitutes institutional controls and give examples.
Page 9 Last Paragraph	Wording suggests site monitoring ends when site operations end, which we are told end with decontamination. Last sentence indicates that monitoring does extend to post-operational period. May cause some confusion.
Page 12 First Paragraph	Does ownership include mineral rights? Need it?
Page 15 2nd Paragraph	Does "plans" include methods?
Page 44 3rd Paragraph	Substitute "All results" for "The results"?
Page 54 3rd Paragraph	"not readily dispersible" and "or soluble" may aggravate reclaimer-intruder consequences
Page 59 2nd Paragraph	It would be useful to define "site maintenance"
Appendix, p. 11 Paragraph #8	line missing in last sentence