

Greenwood Laboratories

DOCKET NUMBER
PROPOSED RULE PR-19, 30, 40, 50, 70, 71, 15
(45 FR 15184) (2)

ANALYTICAL CHEMISTS AND CONSULTANTS

903 E. BALTIMORE PIKE

KENNETT SQUARE, PA. 19348

PHONE: 215-388-7295

8005060046

March 19, 1980

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

Attention: Docketing and Service Branch

Dear Sir:

This letter is in response to the PROPOSED RULES indicated in Federal Register/Vol. 45/No. 48/Monday, March 10, 1980. I do not specifically disagree with the proposed rule except that by omission it seems to me the entire burden is placed on the employer. I believe some mechanism should also be incorporated to preclude or defend the employer against either frivolous or unwarranted accusations. This should be either by allowing compensation for the cost of defense plus additional damages or, at the very least, serve as a defensible basis for discharge of the employee.

Without this additional inclusion I would have to be considered on record as vigorously opposing this proposed rule, even though its obvious intent is in accord with basic principles which I feel to be correct.

Very truly yours,

GREENWOOD LABORATORIES

Gerald R. Umbreit

Gerald R. Umbreit, Ph.D.

GRU:del



Acknowledged by card: 4-1-80-ere