

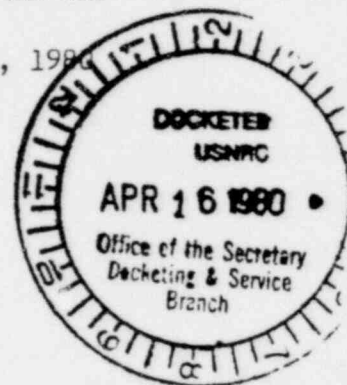


# FOSTER WHEELER ENERGY CORPORATION

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DOCKET NUMBER  
PROPOSED RULE PR-19 et al. (8)  
(45 FR 15184)

April 11, 1980



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

Attention: Docketing and Service Branch

Reference: Federal Register Docket 80-7343  
NRC Byproduct Material License No. 29-03369-03 (10 CFR 34)

Sir:

The following comments concern the proposed revision to NRC regulations, as published in the March 10, 1980 Federal Register, regarding protection of employees who provide information to the Commission.

We support the proposed amendments except for the revision to Section 19.11 (c). We feel that the requirements for the posting of Form NRC-3 should remain unchanged.

The current regulations require the posting of Form NRC-3 in areas where employees engaged in the licensed activities can observe a copy. The prime intent of the proposed changes is only a reinforcement of existing requirements concerning employee protection from discrimination by the employer and is, in no way, related to improvement in radiation safety or radiological working conditions. Therefore, we can see no reason to expand the posting requirement to include all employees who work at the establishment where licensed activities are conducted.

In our shops, less than 3% of the employees are involved in our licensed Industrial Radiography program. To us, there is no obvious benefit to be gotten from posting the proposed Form NRC-3 at multiple entrances and exits to inform the office personnel and other shop workers of their rights concerning something that they are not at all involved in.

The proposed posting requirement would be even more confusing and difficult to comply with at large construction projects where there are a number of contractors, or employers, and, in many cases, more than one NRC licensee conducting activities.

We feel that employees are already adequately informed of their rights and options through DOL requirements and union grievance procedures. Additional posting requirements by the NRC are not necessary.

Yours truly

*Bruce Kovacs*  
Bruce Kovacs  
Senior Radiographer

*L-4-14-19*  
*to 5/1/80*

BK/mb

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