D.F. CARTER ASSOCIATES, INC.

Manufacturers' Representative

P.O. BOX 315

SEEKONK, MASSACHUSETTS 02771

617-336-5192

APR 2 4 1980 1

Office of the Secretary

Docketing & Service

PROPOSED RULE PR- 20

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

Attention: Docketing & Service Branch

Gentlemen:

Reference: Comments on radiation as mentioned in your "NEWS RELEASE" week ending March 25, 1980

As a supplier of mechanical equipment to nuclear plants, I have the following questions relative to allowable millirems per worker at a nuclear plant.

1) What is the allowable millirems?

2) Were the allowable millirems recently reduced?

3) Is there a concerted effort now to reduce the exposure time during refueling and/or maintenance outages? Parameter recommended?

4) If there is a definite way that this outage time can be significantly reduced at existing nuclear plants, and the utilities cost of new equipment recovered in a one year pay back or less....Who at the NRC should be alerted to this method?

It is realized that the N.R.C. does not endorse any company or product, but hopefully this well founded philosophy should not exclude being alerted to a better way of accomplishing what everyone wants....reduce millirems and reduce expensive hourly outage costs.

Thank you for considerations that may be forthcoming.

Sincerely,

D. F. CARTER ASSOCIATES, INC.

April 3, 1980

Frank Carter

Acknowledged by card 12 5/10

8005220122