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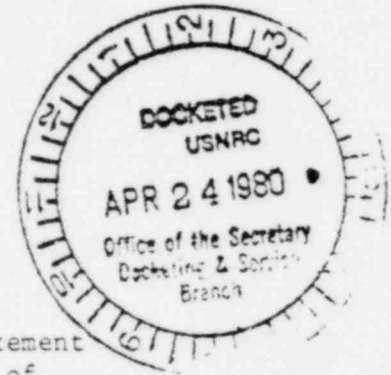
March 25, 1980

DOCKET NUMBER PR Misc Notice
PROPOSED RULE Reg Guide

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

Attention: Docketing and Service Branch

Subject: U. S. Nuclear Regulatory Commission
Draft Regulatory Guide and Value Impact Statement
Measurement of Radiation Levels on Surfaces of
Packages of Radioactive Materials
Task TP 914-4



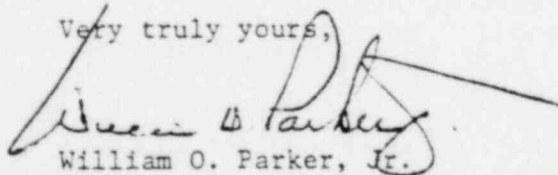
Mr. Secretary:

Duke Power Company wishes to express the following concern in regard to the subject proposed Regulatory Guide. Detailed review of the proposed Reg Guide convinces us that an increase in confusion over shipments will result if the Reg Guide is implemented in its present form.

We would prefer that no requirements of this type be placed on package measurements but that users be cautioned about these chamber size dependent measurements and encouraged to take them into consideration where appropriate. Action could be taken to encourage use of small diameter tubes to avoid confusion in the measurements.

The Value Impact Statement Section 4, Conclusions, refers to Section 2.1.1 in the same section and there is no Section 2.1.1.

Very truly yours,


William O. Parker, Jr.

RFJ:vr

Acknowledged by card... 4/24/80



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