

**Bio-Dynamics/bmc**

9115 HAGUE ROAD INDIANAPOLIS, INDIANA 46250 (317) 845-2000 CABLE BIO-DYN TELEX 27-2103



DOCKET NUMBER  
PROPOSED RULE **PR-19 et al. (11)**  
**(45 FR 15184)**

April 21, 1980

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

Attention: Docketing and Service Branch

Dear Sir:



I am writing in response to the NRC proposed rule: Protection of Employees who Provide Information, affecting 10 CFR Parts 19, 30, 40, 50 70, 71 and 150, which appeared in 45 FR 15184-7.

Bio-Dynamics/bmc does not believe this proposed rule is in the best interests of industry and, in fact, is discriminatory against the employer.

The worker is already protected under Section 19.16 from discharge or discrimination because of any complaint or testimony against his employer resulting from violations of the Act, regulations or license conditions. We strongly believe the worker is adequately protected under present regulations.

We oppose the proposed rule which we believe will probably encourage workers to give "information on anti-trust, safety and security matters" concerning his employer. Such information is irrelevant to radiological safety and breeches the confidentiality of company proprietary matters. We also question the statutory authority to implement the proposed rule under the Right to Privacy Act.

Very truly yours,

**POOR ORIGINAL**

*Robert E. Megraw*

Robert E. Megraw, PhD  
Radiation Safety Officer

REM/cjb



Bio-Dynamics/bmc, Diagnostic Division of Bio-Dynamics, Inc., subsidiary of Boehringer-Mannheim

8005220706

*5/1/80*