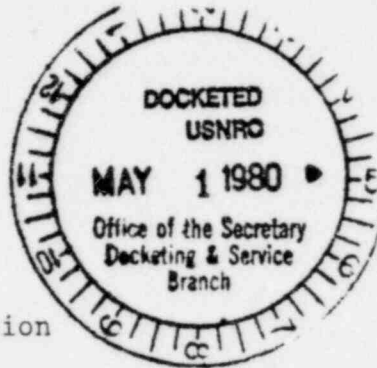


Oklahoma Testing Laboratories

REGISTERED PROFESSIONAL ENGINEERS—CHEMISTS

310 N. KLEIN • PHONES: 232-5211 - 232-4666 • P.O. DRAWER 60268 • OKLAHOMA CITY, OKLA. 73146
BRANCH OFFICES
3308 S. PEORIA • TULSA, OKLA. 74105 - 742-7334 2646 N. MAIN • McALESTER, OKLA. 74501 - 423-4877

DOCKET NUMBER PR-19 (2)
PROPOSED RULE (45 FR 19564)



April 28, 1980

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

ATTN: Docketing and Service Branch

Gentlemen:

We wish to protest your proposed amendment to Par. 19.14 of 10 CFR Part 19 in regard to attendance at conferences between your representatives and those of the licensee.

We can see no good reason for allowing people outside NRC and the licensee to attend such a meeting. Nor can we see why an employee of the licensee, not connected with the work should attend such a meeting. For example, we do concrete testing. An employee in this department has no knowledge of the work using radioactive sources. Nor can we shed big tears for the poor union representative who does not get to attend. It would appear that this entire amendment is being written at the request of a union representative. We can see no intent on their part to do anything but cause trouble. We believe that the unions are now too powerful and certainly do not need another helping hand from a governmental agency. An employee now has plenty of opportunities for redress both from the NRC and the Labor Relations Board.

We have no idea, nor does anyone else, who a representative of NRC might decide had a "legitimate interest in the inspection". This could be a reporter from the new media or a representative from one of the fuzzy-thinking groups such as the Sunbelt Alliance. We see no reason why the private business of a licensee should be open to anyone. We do not believe that your inspectors need a union representative or anyone else to help them enforce their rules.

Very truly yours,

OKLAHOMA TESTING LABORATORIES

M.A. Witte

M.A. Witte
President

MAW:wr
cc: Sen. David L. Boren



STAFF MEMBERS MEMBER OF: AMERICAN COUNCIL OF INDEPENDENT LABORATORIES • AMERICAN SOCIETY FOR TESTING AND MATERIALS • AMERICAN SOCIETY OF CIVIL ENGINEERS • AMERICAN CHEMICAL SOCIETY • AMERICAN CONCRETE INSTITUTE • AMERICAN WATER WORKS ASSOCIATION • AMERICAN WELDING SOCIETY • NATIONAL SOCIETY OF PROFESSIONAL ENGINEERS • AMERICAN INSTITUTE OF CHEMICAL ENGINEERS

8005220 763