

Process Control Division

1601 Trapelo Road,
Waltham, Massachusetts 02154
Tel: (617) 890-2000



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(45 FR 19564)

May 9, 1980

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

Attn: Docketing and Service Branch

Dear Sir:

I wish to comment on the proposed amendment to 10 CFR Part 19 published in the Federal Register on March 26, 1980.

The proposed amendment concerns inspections of licensed facilities and the stated purpose of the proposed amendment is the improvement of the effectiveness of inspections. Apparently the Commission feels that inspections are not as effective as they could be. In my opinion, the lack of effectiveness can be attributed to the impromptu nature of Commission inspections. Most of us in industry have a full schedule every day and a surprise visit by a Commission inspector is both unfair and unreasonable. Much time is lost gathering documents and locating people required to take part in the inspection.

There is some merit to the proposed amendment. However, to make the inspections more effective, they should be planned in advance with or without the proposed amendment. This is particularly important if the Commission plans to invite an expert consultant to the meeting. The presence of this expert consultant in the facility of the licensee may be unacceptable to the licensee. To avoid the possibility of an unpleasant scene, the licensee must be advised in advance of the intention of the Commission to invite this consultant and the consultant must be identified in advance. Planning the meeting in advance will allow the licensee to arrange a suitable meeting place, to have necessary documents available, and to make certain that all persons required for the meeting will be available. The element of surprise contributes very little that is beneficial.

I propose that the proposed amendment be further amended to require the Commission to plan inspections in advance with the licensee participating in the planning.

Very truly yours,

LFE CORPORATION
PROCESS CONTROL DIVISION

William R. Prendergast
Radiation Safety Officer

ACKNOWLEDGED BY CARD

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