

American Airlines

May 14, 1980

DOCKET NUMBER

PROPOSED RULE

PR-19 (48)

(45 FR 19564)

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

Attention Docketing and Service Branch

Dear Sir:

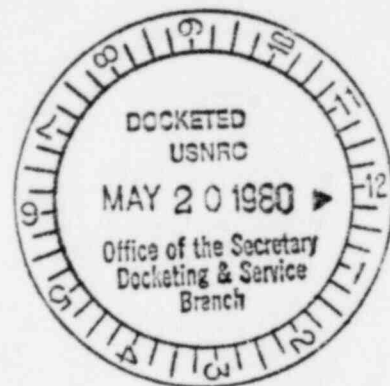
This comment is in response to the notice of proposed rulemaking by the NRC in the Federal Register amending 10 CFR Part 19 of the Commission's Regulations.

The NPR was dated April 10, 1980 and the comment period expired May 12, 1980. Since the notice was addressed only to the American Airlines Maintenance and Engineering Center (instead of to the individual designated for liaison with the NRC) it was not received by the undersigned until May 12, 1980. For this reason the response is late.

The addition of paragraph 19.14 (h) as published in the Federal Register seems to be unnecessary and would likely lead to complications in the meeting on inspection findings between the NRC Inspector and the licensee representative. Paragraph 19.14 (b) allows Commission Inspectors to consult privately with workers during inspections. Paragraph 19.14 (c) allows a worker's representative to accompany Commission Inspectors during the inspection. Paragraph 19.14 (f) allows "an individual who is not routinely engaged in licensed activities..." with the approval of the licensee and the worker's representative, to accompany Commission Inspectors during the inspection. Paragraph 19.15 (b) allows a worker to consult privately with the Commission Inspector. The foregoing provisions provide the mechanisms for a thorough inspection and an opportunity to "clarify inspection objectives and procedures."

On the other hand, including "individuals that have a specific and legitimate interest" in attending the meetings on findings may:

- (1) Inhibit a free exchange of information between the representative(s) of the licensee and the Commission's Inspector(s).
- (2) Lead to a confrontation between the representative of the licensee and the invited individuals.
- (3) Provide an opportunity for "Consultants" representing workers in sympathy with the ANTI-NUKES to invade industrial radiography operations.



Acknowledged by card. 5/20/80... mdv.

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Secretary of the Commission
Washington, D.C.

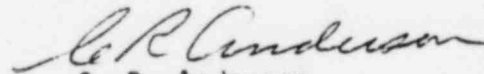
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While the proposed rule appears to have been written to cover situations dealing with construction and operation of nuclear power plants, it would also be applied to industrial radiography operations. The petition on file with the NRC to separate regulations covering fissile material from those covering by-product material, if approved, would correct "over regulation" of industrial isotope radiography.

Very truly yours,

AMERICAN AIRLINES, INC.



C. R. Anderson
Manager
NDT Quality Assurance

cc: R. D. McLure