

Air Transport Association



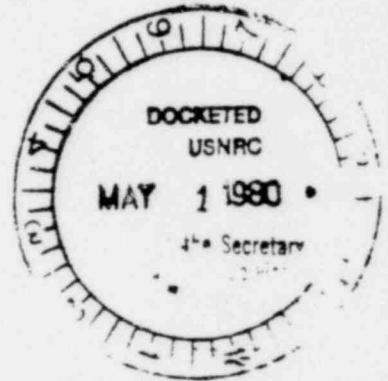
OF AMERICA

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3/31/80

~~JOINT NUMBER~~ **PR-170** (4)
~~PROPOSED RULE~~
(45 FR 20899)

April 28, 1980



Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, DC 20555

Dear Sir:

This is in response to a proposed amendment to 10 CFR Part 170 which would impose fees for NRC review of quality assurance programs required by Section 71.51(a) published in the Federal Register on March 31, 1980.

On behalf of the affected member air carriers, ATA objected to the adoption of the quality assurance requirements for radioactive material shipping containers since they serve no useful purpose for the by-product material used by the airlines.

One affected ATA member airline now has an approved quality assurance program for radioactive material shipping packages consisting of 3 1/2 typewritten pages. The proposed \$160 minimum fee for review of these 3 1/2 pages is totally unjustified.

The affected airlines and the public will derive no measurable benefit from the proposed "review" of unnecessary quality assurance programs for the shipment of the radioactive materials used by the airlines. Therefore, the proposed revision to the fee schedule should be withdrawn.

Sincerely,

E. L. Thomas
Vice President
- Engineering

VWB:sle

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Acknowledged by card. mdw 5/1/80