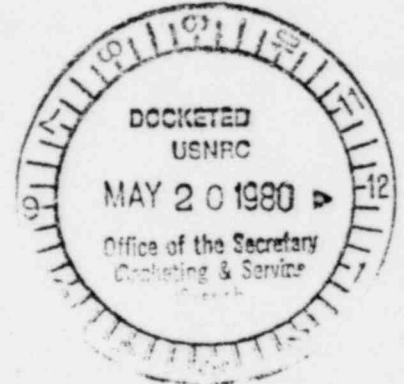




UNITED STATES DEPARTMENT OF COMMERCE
National Bureau of Standards
Washington, D.C. 20234

DOCKET NUMBER
PROPOSED RULE **PR-19 (47)**
(45 FR 19564)
May 12, 1980



Secretary of the Commission
U. S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, DC 20555

Subject: Comments on Proposed Rules for 10CFR Part 19

Dear Sir:

The proposed amendment to 10CFR Part 19, as described in your April 10, 1980, Notice to NRC Licensees and Other Interested Persons, would permit NRC inspectors to invite non-involved individuals to pre- and post-inspection interviews with licensees, and to meetings with licensees during inspections.

Without considerable specification on the nature of the interest which could lead to such an invitation, this could lead to conflicts, perhaps even violations, with licensee security, privacy, or other concerns. As we cannot see justification for inviting any outsider for other than technical consultation, as inspectors are generally qualified in technical matters, and as interim decisions by inspectors are subject to review by the NRC management after an inspection, we see no justification for this amendment at all.

Thank you for your attention to this matter.

Sincerely,

Thomas G. Hobbs
Thomas G. Hobbs
Chief, Health Physics

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