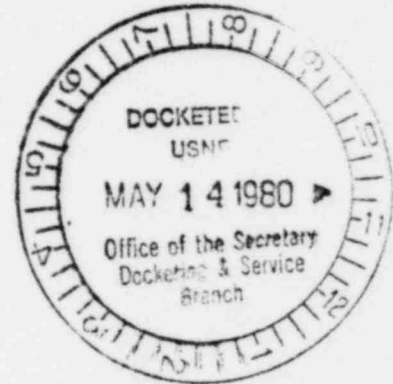


PROPOSED RULE NUMBER PR-19 (30)
(45 FR 19564)

PHILIPS MEDICAL SYSTEMS, INC.

May 9, 1980
512-80



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

Attention: Docketing and Service Branch

SUBJECT: COMMENTS ON 10 CFR PART 19 "PROPOSED INFORMAL
CONFERENCE"

Gentlemen:

Philips Medical Systems, Inc. is an importer, exporter, and manufacturer of diagnostic X-ray systems. We also, import Cobalt Therapy equipment and install and service same. In addition, we are licensed to use small amounts of radioactive materials for test and calibration purposes in our factory.

Philips Medical Systems, Inc. objects to the proposed rule on the following grounds:

1. There should be a definition of "interested parties" given in the rules. The present way the term is used is too broad and vague.
2. We do not believe any good will be done having "outsiders" taking part in tentative findings discussions and meetings.

If N.R.C. strongly desires to have the "interested parties" and "consultants" appraised of their findings then these persons could be included in a meeting at the conclusion of the inspection to review the N.R.C. inspection findings.

We trust you will consider these recommendations favorably.

Very truly yours,

Robert F. Avrutik
Regulatory Department

RFA:lh 8006090009