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Reliance Testing Laboratories, Inc.

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P.O. Box 85, Timonium, Maryland 21093 - (301) 252-6030

DOCKET NUMBER

PETITION RULE PRM-71-8⁽¹⁾

July 30, 1980

(45 FR 39519)

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

Attention: Docketing and Service Branch

Reference: Docket Number PRM-71-8

Dear Sir:



Reliance Testing Laboratories, Inc. is a small business specializing in the field of Nondestructive Testing. This field includes the use of sealed radioactive sources for Industrial Radiography.

The referenced docket requests that the Commission exempt persons licensed pursuant to 10 CFR 34 for Industrial Radiography from the provision of 10 CFR 71.12(b)(1)(1) requiring that such persons have a copy of ...all documents referred to in the license, certificate or other approval... in order to be able to deliver licensed material to a carrier for transport under the general licensing provision of 10 CFR 71.12.

The burden of required paperwork to be kept on file by a small business is constantly increasing. With limited office space and staff the additional documents required become excessive. We are in complete agreement with the petitioner that it is adequate for a radiography licensee to have on file only the Certificate of Compliance for a given source shipping container.

As a radiography licensee we are authorized by the Nuclear Regulatory Commission to use only specific shipping containers. Approval for these containers has never been requested during NRC or state inspections of our radiography program.

We urge your approval of the referenced petition for rulemaking.

Very truly yours,
Reliance Testing Laboratories, Inc.
Wilbur F. Brown, Jr.
Wilbur F. Brown, Jr.
President

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WFB/rcp
cc: Frank C. Friedel,
Radiation Safety Officer

Acknowledged by card. 7/31/80. mdv

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