



GEORGIA INSTITUTE OF TECHNOLOGY

Nuclear Research Center

Office of Radiological Safety

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Atlanta, Georgia 30332
(404) 894-3605

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PROPOSED RULE
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Secretary of the Commission
Nuclear Regulatory Commission
Washington, D C.

REFERENCE: NRC Proposed New Enforcement Action Policy

Dear Sir:

This new proposed enforcement action policy is poor in my opinion because it is too confusing with the severity level concept of a "Violation." To most people the severity level, regardless of the number assigned to it, will be synonymous with the word "Violation." Inspectors should declare findings simply: (1) violation or (2) no violation. The individual NRC inspectors judgment, is as in the past, the key to the whole inspection system anyway. Why make it more complicated for him and the licensee?

Fines should be leveled as a last resort after appropriate warnings have been made.

Sincerely yours,

Robert M. Boyd
Radiological Safety Officer
Georgia Institute of Technology

RMB:dwa

Acknowledged by card... 11/7/80

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