

# Wright State University



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Radiation Safety Office  
November 18, 1980



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

DOCKET NUMBER  
PROPOSED RULE PR 2  
45 FR 66754

Attn: Docketing and Service Branch

The University Radiation Safety Committee wishes to submit the following, for the record, regarding the comprehensive statement of enforcement policy (45FR6675U), circulated under Director Thompson's memorandum, dated October 28, 1980.

It is the opinion of the Committee that the ongoing evolution of the Commissions Regulatory Policy lends disproportionate significance attached to matters of little potential or actual consequence, while failing to realistically address matters of demonstrable biological and environmental consequence. It would appear that the regulatory policy development and the proliferation of record keeping regulations is for the convenience of formulating a single sweeping directive which in turn is for the convenience of the inspection staff.

The Committee notes that regulatory and record-keeping failures among certain classes of licensee have lead to an increased demand on this institution, without regard to the applicability or usefulness of such requirement. In particular, the Committee notes that professionally supervised, competent radiation safety programs are tarred with the brush indiscriminately applied to other licensee classes.

The referenced document does not itself institute an unreasonable burden on the University resources, and may serve a purpose in attempting to form a coherent catalogue of regulatory policy. However, it is perceived as a formulization of enforcement policies that divert resources from operation of a competent radiation safety program to documentation of inconsequential matters.

Acknowledged by card... 12/5/80

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Please direct any questions pertaining to this matter to the undersigned (513) 873-2371 or the University Radiation Safety Officer at (513) 873-2169.

Sincerely,

Adrian V. Rake, Ph.D.  
Chairman

*Handwritten initials: L.H.H.*

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