



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

Docket Nos. 30-3796
30-3798

8 JUL 1981



United Technologies Corporation
Pratt and Whitney Aircraft Corporation
ATTN: Mr. Arthur E. Wegner
Executive Vice President
400 Main Street
East Hartford, Connecticut 06102

Gentlemen:

Subject: Combined Inspection 30-3796/81-01 and 30-3798/81-01

This refers to your letter dated April 24, 1981, in response to our letter dated April 2, 1981.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

With respect to your response to item A, we find no information in your letter which indicates that your shielded x-ray facility is not "... a shielded installation or structure designed or intended for radiography and in which radiography is regularly performed." (10 CFR 34.2(h)). As a result, no sound basis has been presented for withdrawing the item of noncompliance. There are three courses of action open to you:

1. Comply with 10 CFR 34.29(b); or
2. Obtain an exemption from 10 CFR 34.29(b) from USNRC, Office of Nuclear Material Safety and Safeguards, Materials Licensing Branch, Washington, D.C. 20555; or
3. Obtain an official interpretation of 10 CFR 34.29(b) as it applies to your circumstances by following 10 CFR 30.5. Any such request should be addressed to USNRC, Office of The General Counsel, Washington, D.C. 20555.

Should you elect to pursue either Option 2 or 3, we would appreciate receiving a copy of your submittal.

We appreciate your cooperation with us.

Sincerely,

James H. Joyner

James H. Joyner, Chief, Technical
Inspection Branch, Division of
Engineering and Technical Inspection

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cc: Mr. George E. Parson

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