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THE CLEVELAND MUSEUM OF ART

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Conservation Department

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Secretary
United States Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Service Branch

Dear Sir/Madam:

The definition of small entity status, as it pertains to museums is much too limiting. The NRC has ruled that museums are not "traditional" educational institutions. This is ludicrous, as museums expend many of their resources and manpower on teaching, training, and advancing scholarship. We feel that the definition of an educational institution should be amended so that nonprofit museums are included. In the case of The Cleveland Museum of Art, there are a wide variety of educational programs in place to help the visitors of every age, circumstance, or art experience to enjoy the Museum and see, discover and appreciate works of art. The Museum takes an active role in the community by teaching art history to children, teaching future museum professionals and being involved with the continuing education of local teachers.

The importance of education at The Cleveland Museum of Art was recognized from the very start. Almost a year prior to the formal opening of the Museum building on June 6, 1916, the Education Department had been organized and was preparing the way for activities to be carried forward the moment the new building became available. The Cleveland Museum of Art was therefore one of the first museums in the country to realize the importance of education programs for all of its audiences. These programs are undergoing constant evaluation in order to redefine our goals, institute appropriate review procedures, experiment with new programs and technologies and reach out to non-traditional audiences. The Education staff currently is comprised of nine full-time instructors and approximately 40 part-time teachers. This staff conducts tours and lectures in the galleries to school groups, adults and any other groups that make such a request and teaches art classes to students from the age of 3 to 17. Not only does the Education staff work with the school children, but with their teachers through the Teacher Resource Center (TRC). The TRC provides public and private school teachers with specific information related to the Museum's collection and general information about art history. The TRC offers slide packets, reference materials and teacher workshops. Last year the Teacher Resource Center applied to the Ohio Department of Education and was approved as a provider of Continuing Education Units. This accreditation has brought many new participants to the TRC and strengthened the program.

The Museum plays a key role in the art history program conducted by Case Western Reserve University (CWRU) which could not exist without the Museum's participation. All the art history classes conducted by CWRU are taught in the Museum which furnishes a library, slide collection, classrooms and lecture halls. In addition to providing for all of the above, approximately a dozen of the curators are adjunct faculty for the art history program.

The Museum is also actively involved with the training of museum professionals. The Education Department has two fellowships one of them funded by the Getty. These interns are expected to conduct lectures and tours for the various audiences. In addition they help to evaluate

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and assess the education programs with the Assistant Director of Education. The Conservation Department, which houses the Beta plate, is also actively engaged with the education of future conservators. The Department has two fellowships which are endowed by the Andrew W. Mellon Foundation. These positions are usually offered for two years to recent graduates of the conservation programs who wish to gain additional experience. The fellows are expected to hone and sharpen their conservation skills by carrying out routine examination and treatment of works of art. As part of this process the Fellows gain additional experience using the equipment at the Museum which includes microscopes, x-ray diffraction equipment, x-ray fluorescence equipment, an infrared vidicon, the Beta plate and diagnostic x-ray equipment. As part of the fellowships, the successful candidates are encouraged to do an original research project that focuses upon the Museum's collection and makes use of the Museum's equipment. One research project has recently been completed on the painting techniques of the Renaissance Italian master Pinturicchio which has resulted in an article in The Bulletin of the Cleveland Museum of Art and a small exhibition for the public. Currently the Renaissance bronzes in the collections are being given a thorough examination using x-radiographs, quantitative analyses by x-ray fluorescence spectrometry, microscopic and visual examination. This project should result in a technical catalogue of the Renaissance bronzes to be published in the Bulletin.

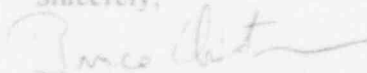
In addition to the Mellon Fellowships, the Conservation Department accepts interns from the three Graduate Training Programs in Art Conservation. Over the last five years, the Museum has hosted four interns, an unusually high number. As part of these training programs, the students in the third year are sent to work with practicing professionals, usually in museums. The purpose of this third year of study is varied, but in general is intended to expose the students to new conservation techniques including examination techniques, and to the workings of a museum as well as to enable them to hone their conservation skills. All of the Museum's facilities and equipment (including the beta plate) are available for their use.

Similar types of educational activity will be found at peer institutions, with this type of commitment to education, how can museums not be defined as educational institutions?

The number of museums that own beta plates is very small, probably not much more than a dozen. Nearly all of these institutions are hard pressed financially, and in the present financial climate, nearly all have had to let people go. Recently, in the case of one museum, it has had to de-commission its radioactive sources. These annual fees are a hardship on museums, and there are no customers to pass the costs along to. In terms of the NRC budget, the amount of money lost by expanding the definition of an educational institution for small entity status to include non-profit museums will be negligible. Yet the \$2,200 difference makes a huge difference in museums' budgets.

In short, museums are involved with educational activities on many levels for a wide variety of audiences--from the general public to school children, to teachers, to scholars, burgeoning museum professionals, and university students. With so much of a museum's resources and manpower committed to education, the NRC should amend its definition of an educational institution to include museums, so that they qualify for small entity status.

Sincerely,



Bruce Christman
Chief Conservator