



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
200 STOVALL STREET
ALEXANDRIA, VA 22332

DOCKETED
USNRC

82 AUG 11 10:56

DOCKET NUMBER
PROPOSED RULE

PR- Misc. Notice
(Reg Guide)

112N/GWH
\$100.00/8
OFFICE OF DOCKETING
BRANCH

9 AUG 1982

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

Gentlemen:

A review of the draft regulatory guide titled "Qualifications for the Radiation Safety Officer in a Large Scale Non-Fuel-Cycle Radionuclide Program" indicates the document will have little impact on industrial Navy licensees. This is based on our judgment that it will apply to very few of these licensees and of those effected, the present RSO would likely meet the requirements in guide. If the situation were to occur where the guide was applicable and the RSO did not meet the requirements, it appears reasonable to upgrade the RSO position to meet the requirements.

We consider the requirements in the proposed guide to be basically consistent with present unwritten Navy requirements and, accordingly, the guide will serve a useful purpose for the Navy.

Sincerely,

Gene Hendrix

GENE W. HENDRIX
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8/16/82 emp