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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

August 17, 1982

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

DOCKET NUMBER PR-50
PROPOSED RULE (47 FR 33980)

Attn: Docketing and Service Branch

Re: Proposed Rule 10CFR50
Personnel with Unescorted Access to Protected Areas; Fitness
for Duty (Federal Register/Vol. 47 No. 151/Thursday, August 5, 1982)

Dear Sir:

NUMANCO is a major health physics contractor, most of whose employees require unescorted access to protected areas of client facilities (primarily nuclear power plant licensees).

The proposed paragraph (x) to Section 50.54 is a concise definition of the "continued observation" requirement of Section 4.3 (Employee Screening) of ANS 3.3/N18.17-1973 or Section 5.3.5 of later revisions to ANS 3.3.

As such, the proposed rule does not constitute a new requirement. NUMANCO does question the introduction of this proposed rule into 10CFR50. It would seem that a change to 10CFR73 (and 10CFR10 for NRC personnel) would be more appropriate.

The economic impact of this change to our Company would be insignificant if implemented by the client's security organizations. The requirement for documentation of certain aspects of the rule by us and audit requirements by our clients already exists contractually.

Should you have any questions or require further information, please contact me.

Very truly yours,

NUMANCO, Inc.

John D. McCann
John D. McCann
Operations Manager

JDM:sac

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