

**ELECTRIC BOAT CORPORATION**

**A GENERAL DYNAMICS COMPANY**

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DOCKETED  
USNRC

'96 SEP -3 A10:27

322/RSO/045-96

August 26, 1996  
OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH (4)

To: Secretary, U.S. Nuclear Regulatory Commission  
Attention: Docketing and Services Branch  
Washington, DC, 20555-0001

DOCKET NUMBER

PETITION RULE PRM 34-5  
(61FR30837)

Subject: 10 CFR Part 34 - Docket No. PRM-34-5

1. Electric Boat Corporation supports the Amersham Petition for Rulemaking concerning the regulations specified in 10 CFR 34.20. The need for specific regulatory approval of rigid source stops, jet engine probes, collimators, guide tubes and other associated equipment should not exist. No increase in radiation safety or reduction in occupational radiation exposure will be contrived from these approvals. No positive economic benefits will be derived from these approvals and in some cases severe detrimental impact will result from this added burden.
2. As addressed in the petition, these types of associated equipment have been used safely throughout the industry for many years. The inconsistent administration and interpretation of these requirements from region to region and state to state causes unnecessary confusion. Strict compliance with these implied regulations will increase radiation exposure and are contrary to the ALARA principles of 10 CFR 20.
3. Your prompt attention to this matter would be appreciated. If you require any additional information, please contact the undersigned at  
(860) 433-2531. Thank you for your time and consideration.

*Garry L. Balestracci*

Garry L. Balestracci  
Radiation Safety Officer  
Electric Boat Corporation

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34-05 PDR

L-4-1 Petition for Rulemaking

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