



**UNITED
TECHNOLOGIES
PRATT & WHITNEY**

DOCKET NUMBER

RECORDED DATE

PR-19,20,30 et al.

(50FR 51992)

400 Main Street
East Hartford, Connecticut 06108

May 8, 1986

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

Attention: Docketing and Service Branch

Dear Secretary:



The following comments are provided regarding the proposed revision of 10 CFR Part 20. Pratt & Whitney manufactures jet engine parts from sheet stock which nominally contains 2.2% Thorium Oxide dispersed in a nickel matrix Aerospace Material Specification (AMS) 5865.

1. The value for Natural Thorium was deleted from Appendix B. Natural Thorium best describes the radioactive material present in AMS 5865. We request it be included in the proposed Appendix B.
2. The value for Natural Thorium in Appendix C (quantities requiring labeling) was reduced from 100 microcuries to 0.001 microcuries. Additionally, the present section of Part 20 i.e. 20.203(e)(1) and f(3)(ii) which allows reasonable storage of natural thorium and uranium without labeling was deleted. The proposed standard would require posting many areas within our facility and labeling of containers when no radiation hazards exist. This proposed overuse of caution/danger signs will cause indifference to the signs and the radiation symbol. Typically, radiation levels are less than 0.0002R/hr within 5 centimeters from thoriated nickel parts. Employees working within areas where thoriated nickel parts are stored or processed would receive less than the 0.1 rem per year reference level specified in Section 20.303 of the proposed standard. We request that unfinished thoriated nickel engine parts containing less than 4% thorium be exempt from the posting/labeling provisions of the proposed revision.
3. Section 20.802 of the proposed standard requires that the licensee maintain constant surveillance of licensed material which is in a controlled or unrestricted area. This is not feasible as written because any unfinished aircraft engine part which contained any amount of thoriated nickel would require constant surveillance. We request that unfinished thoriated nickel aircraft parts containing less than 4% thorium be exempt from this section.

Respectfully Yours,

Gerald W. Lancour

Gerald W. Lancour, CIH
Manager
Industrial Hygiene & Safety
M.S. 124-20
400 Main Street
East Hartford, CT 06108
(203) 565-3440

8605230307 860508
PDR PR
19 50FR51992 PDR

Reviewed by Card

5/16/86

pa

R.E. Alexander, 1130 SS
Wm. Olmstead, 9604 MNBB
J. Becker, 9604 MNBB

DS10
add: