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Company

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industrial process controls

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OFFICE OF
DOCKETING & SERVICE
BRANCH

Docketing and Service Branch
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

This letter is in response to your request for public comment on whether the NRC should amend its regulations to require certain persons licensed to possess nuclear materials to demonstrate that they have adequate financial means to pay for cleanup of accidental releases of radioactive materials.

1. I personally support the concept of assigning cleanup costs to the responsible parties and understand that the time to qualify potentially responsible parties is prior to an incident to help prevent hardship to the public.
2. However, I believe that great attention and care should be devoted to the selection of categories of responsible parties so that:
 - a. These entities are not burdened with excessive recurring costs for bonds, etc., which are disproportionate to the likelihood that a cleanup will ever occur using statistical or historical indicators.
 - b. Each entity is held financially responsible only for the cleanup of source material under its jurisdiction; i.e., once an isotopic source has been sold and legally conveyed to a general licensee in a gauge, the general licensee should assume financial responsibility for it. Depending on the process and extent of bonding or other financial proofs required by the NRC, such requirements could discourage a number of smaller end-users from purchasing such equipment, hence unnecessarily limiting its advantages to "deep pocket" customers.
 - c. Any assessments which are made should consider not only the chances that a release will occur but the relative potential for damage or cleanup costs so that the differences between operating nuclear reactors and using nuclear thickness gauges are recognized and fairly addressed.

Please be aware that the comments herein are my own and do not necessarily represent action on behalf of my employer or imply any consensus of management opinion on the subject.

W. E. Holt

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Radiation Safety Officer

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Acknowledged By card NOV 13 1985

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