



STATE OF NEW YORK
DEPARTMENT OF LABOR
Division of Safety and Health
ONE MAIN ST.
BROOKLYN, N.Y. 11201
Room 813

AB34-1 PDR

November 24, 1986

U.S. Nuclear Regulatory Commission
Office of State Programs
State Agreements Program
Washington, D.C. 20555

Attention: Donald Nussbaumer
Assistant Director

Re: Registration of Sources and Devices;
Amendment to Parts 30 and 32

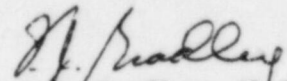
Dear Mr. Nussbaumer:

We read over these proposed amendments to Parts 30 and 32 and feel that there is no need for amendments and they would be redundant. What appears to be taken place is the substitution of a registration for a license which we feel is inappropriate.

The registration sheets (so-called) of sealed sources and devices is a summary document of material already submitted and incorporated in a license. The sealed source and device sheets are available to all licensing agencies and not necessarily public document in a sense of a license. They are for convenience of these agencies.

Furthermore, the registry includes generally licensed sealed sources and devices but the rule is only applicable to specifically licensed sealed sources and devices. There could potentially arise confusion over the applicability of these provisions to generally licensed sealed sources & devices. We believe the amendments would only encumber an already elaborate licensing system.

Sincerely,


F.J. Bradley, Ph.D.
Principal Radiophysicist

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