



# THERMO-SCAN ENGINEERING, INC.

Box 2327 • 7880 South Ogden Way • Littleton, Colorado 80161 • (303) 795-1611

PROPOSED RULE PR-Misc Notice  
(Reg. Guide)

May 17, 1985

FC 407-4

Div 10



Docketing & Service Branch  
U. S. Nuclear Regulatory Comm.  
Washington, DC 20555

Gentlemen:

I just received a copy of the January 1985 draft of the guide for preparation of licenses for portable gauging devices. Although the April 5 comment date is past, I would still like to add my comments which hopefully can still be useful.

After a very brief review, the document appears to have greatly simplified the licensing procedure. Permitting a variable number of gauges along with permitting addition of employees as users as soon as they have completed a vendor's school are distinct improvements. I saw nothing that I thought would be an unnecessary burden on the user.

I would like to comment that the draft does not adequately cover inter-state movement of gauges. Some users stay in one city; others like myself fly and drive all over the county to perform roof inspections. These inspections typically last only a few days and we are then on to the next city. I have added some items to my radiation safety program which I feel would be desirable for such users. For instance, I would have no idea what the local procedures are in Washington DC. Instructing an employee to call my office where there is a 2 hour time difference serves no useful purpose. I have simply made the instruction to contact the nearest public safety agency and request that they activate their own nuclear accident plan. This lets them know immediately that a car accident is more than just a simple accident. The draft does not define much about transferring a gauge to a common carrier. I have enclosed a copy of the plan for your use.

I received the draft because I am in the process of preparing an application for my new employer which is a large A/E firm with over 25 offices nationwide. I want to establish a single master license for the company which will list the HQ as the primary storage site, the other offices as secondary sites along with temporary use at various job sites. I have inquired of the Ft. Worth office and find that such a procedure is acceptable. I think that it would be desirable to add to the license manual whatever rules you wish to establish for multi-

8507120390 850517  
PDR REGGD  
10. XXX C  
PDR

110

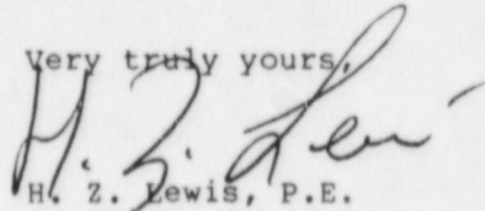


office licensees. I should think that a reduction of the duplication of multiple licenses would be an advantage to you.

While this may be beyond the scope of this particular document, it does affect licensees who operate nationwide. There is a problem of notification when going into the various agreement states. It would be advantageous to have the NRC license be considered a nationwide license applicable to all states. If one operates only or primarily within an agreement state, then the state license would be used. However, if one operated in many states, then the NRC license would prevail.

I would like to receive a copy of the final document once it has been approved.

Very truly yours,

A handwritten signature in dark ink, appearing to read "H. Z. Lewis". The signature is fluid and cursive, with a long horizontal stroke at the end.

H. Z. Lewis, P.E.

HZL:cj