



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
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July 17, 2001

CDS, Inc.  
ATTN: Jerry R. O'Donniley  
Radiation Safety Officer  
14220-J Sullyfield Circle  
Chantilly, Virginia 20151

SUBJECT: RADIOGRAPHER TRAINING REQUIREMENTS PER 10 CFR 34.43

Dear Mr. O'Donniley:

This is in response to your questions in the fax letter dated July 13, 2001.

The requirements in 10 CFR 34.43(a)(1) have not changed. The 2-month on-the-job training requirement refers to the time required before an inexperienced, uncertified individual becomes eligible to take the exam for certification. Certified radiographers, as stated on page 8-13 of NUREG-1556, Volume 2, titled "Program Specific Guidance About Industrial Radiography Licenses", should receive the same training as that given to assistant radiographers. That training for an experienced person should be tailored to their specific needs and would be of much less duration than that required for an inexperienced individual. The radiographer must be given practical training in the equipment to be used, and in your operating and emergency instructions. The licensee must maintain records of the training given, the assessment (test results) of the radiographer, and the practical examination results. There is no need for you to amend your license to accomplish this training of newly hired, experienced radiographers, if you conduct it as described in the NUREG. You may access a copy of NUREG-1556, Volume 2 at the NRC web site [www.nrc.gov](http://www.nrc.gov).

Regarding your second question, there is no fee for license amendments. If you have further questions, you may reach me by telephone at (404) 562-4735, or by e-mail at [djc3@nrc.gov](mailto:djc3@nrc.gov). Our fax number is (404) 562-4955.

In accordance with 10 CFR 2.790 of NRC's "Rules of Practice," a copy of this letter and Enclosure 1 will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Thank you for your cooperation.

Sincerely,  
/RA/

David J. Collins, Health Physicist  
Division of Nuclear Materials Safety

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