

Pipe Fabrication Institute

1326 FREEPORT ROAD

PITTSBURGH, PA. 15238

TELEPHONE: (412) 782-1624, TWX 710/664-4202

Hdgtrs, PDR

PETITION NO. PRM-34-2(43FR34563)

January 3, 1979

Secretary of Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing & Service Branch

Subject: Proposed Registration of Industrial Radiographers. Petition
by Mr. W. P. Peeples, President, Nondestructive Testing Management
Association, concerning registration of Industrial Radiographers.

Reference: Federal Register, Volume 43, No. 151 - Friday; August 4, 1978,
Docket No. PRM-34-2.

Gentlemen:

The purpose of this letter is to speak against the proposal outlined in the
petition submitted by the Nondestructive Testing Management Association.

The responsibility for the safe operation of an Industrial Radiography
Program at present rests with the licensee. We agree that this is where
the responsibility should lie and the proposal does not seek to reduce this
responsibility. The licensee provides the facilities and equipment and
an operating procedure all of which at present are approved by the NRC. None
of these items are under the control of the individual radiographer. The
individual radiographer does have the prerogative, even the responsibility,
to report to the NRC any practices which he believes to be unsafe. It is
our opinion that this arrangement has produced a minimum of overexposure
incidents in the past.

The primary deterrent to accidental exposure to radiation is education.
This can best be administered and controlled by the licensee with super-
vision by the NRC as presently exists. Under the proposal a radiographer
moving from one facility to another would still require training by the
licensee at the new facility to familiarize the radiographer with his new
procedures. This would have to be done whether the radiographer is licensed
or not.

There would be a powerful incentive for a radiographer to try to cover up
an exposure incident if there would be a danger of losing his license and
the possibility that his future employment in the industry would be affected.

Acknowledged by 1/15



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Secretary of Commission
Washington, DC 20555

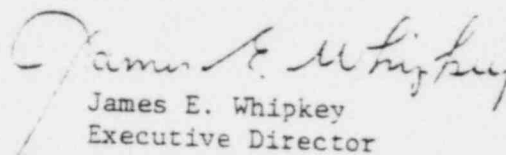
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Enclosed with this letter you will find a brochure describing the Pipe Fabrication Institute. At a recent meeting of the PFI Engineering-Metallurgical Standards Committee, the proposal by the Nondestructive Testing Management Association was discussed. It was the unanimous opinion of the Committee representatives that the licensing of Industrial Radiographers, such as being proposed, would add nothing to the safety of the industry. Also, it would increase the cost of doing business since the cost of training and licensing would be born by the licensee. In addition, it would add another government function which would be paid for by individuals and industry in the form of taxes without any apparent benefit.

In conclusion, it is our contention that the proposal under present consideration for licensing of radiographers should not be adopted.

Sincerely,


James E. Whipkey
Executive Director

JEW/lam
Encl.

cc: C. D. Eisleben
J. E. Bowes
W. A. Molvie
Lyber Katz
J. T. Fort, Esq.
J. T. Tierney III, Esq.