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DOCKET NUMBER PR 34
PROPOSED RULE
(54 FR 47089)

DOCKETED
DATE

December 14, 1989

'89 DEC 26 P12:17

OFFICE OF THE SECRETARY
DOCKETING AND SERVICING
BRANCH

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attention: Docketing and Servicing Branch

Reference: 10 CFR Part 34
RIN 3150-AD35 ASNT Certification of Industrial
Radiographers

Dear Sir,

These comments are submitted for the Commission's consideration prior to the passage of the amendment concerning 10 CFR Part 34 "Licenses for Radiographic Operations". These comments specifically address the fact that all active radiographers will be certified in radiation safety by the American Society for Nondestructive Testing (ASNT), in lieu of current licensing requirements to submit descriptions of planned initial radiation safety training and qualification procedures.

Comment #1

This individual encourages the Commission to recognize ASNT and their program as an alternative to providing internal safety training but only as an alternative. Each individual licensee should still be required to produce qualification and safety procedures and administer same. Removing this responsibility from the licensee only distances the company from the individuals ability. Not all companies have the ability to provide adequate training for radiographers and in these cases a third-party certification would be beneficial. The responsibility of employing and utilizing well trained and safe industrial radiographers will remain with the licensee, therefore, the administration of the certification should remain with the license holder. This will enable the employer not only make judgments on an individual's ability but his moral character. This is and always will be the most important aspect of radiation safety.

Comment #2

Since the licensee will maintain responsibility of the radiographer's actions, the company can only assure that this individual is adequately trained by administering its own program in addition to ASNT's. I am assuming that liability and responsibility for actions will not be imposed on the individual or ASNT but remain with the licensee. In this case, the proposed ruling simply imposes the additional financial burden of redundant testing upon the industry.

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Comment #3

The ASNT has estimated the cost to the industry for certification to be approximately \$1,000 per radiographer, which includes exam fees and costs, travel and administrative costs and lodging at the testing site. My personal feelings are that this estimate is below actual figures. Please find my cost estimate for the re-certification of a radiographer currently trained and working listed below.

Radiographer labor rate	Hourly	\$12.80 per hr.
Average at MQS-Hartford facility	Benefits (28%)	<u>3.58</u>
		\$16.38 per hr.

40 hours classroom	x \$16.38 =	\$ 655.20
16 hours travel	x \$16.38 =	262.08
8 hours examination time	x \$16.38 =	131.04
8 days subsistence	x \$25.00/day=	200.00
Motel-7 nights	x (approx. \$50.00/nite)=	350.00
Air travel to Columbus, Ohio		450.00
ASNT fees		<u>UNKNOWN</u>
		\$2,048.32

If I estimate ASNT's cost for exams fees and administrative costs between \$300.00 and \$500.00 this would bring re-certification costs to between \$2,348.32 and \$2,548.32 per individual. The ASNT certification program does effect the licensee's training costs since retraining would be required of presently trained personnel which currently do not require 40 hours retraining under the present system. Individuals currently not certified as radiographers would need training under the current system and I have removed the 40 hour training portion from the below cost estimates. Using ASNT's figure of 12,000 individuals involved and utilizing one-half as current radiographers and one-half as new applicants the figures are significantly larger than ASNT's estimated 6.7 million.

6000 radiographer's being re-certified under the new program x \$2,548.00 =	\$15,288,000.00
6000 new applicants not trained prior to ruling x \$1,892.80 =	<u>11,116,800.00</u>
Cost to industry in 1989 =	\$26,404,800.00
dollars based on a 30-yr. period	

This amount of training burden will most definitely be a hardship on a small industry like industrial radiography.

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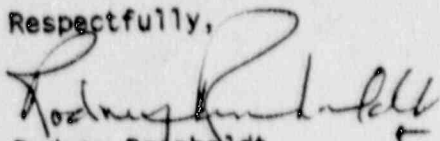
Comment #4

The system currently being utilized in Texas is an excellent start with well documented results. The difference between what is proposed and the system currently being utilized by Texas is that the regulating agency is also administering the certification. If the individual states would administer this proposed program, it would be more effective in promoting the downtrend in overexposure that everyone in the industry would certainly welcome. Costs would be controlled by reduced travel expenses and monitoring would be more easily achieved. Each state could more effectively monitor licensee's activities.

If the individual radiographer was more responsible for his own actions it would promote safer working practices. When a radiographer violates safe operating practices not only should the licensee be responsible but the individual radiographer should also shoulder his share of the penalty. Training is extremely important in achieving a safe work environment but an individual's use of this training is the key to it being effective.

In closing, the desire for ASNT to provide training to the industry as an alternative is to be applauded but to make it mandatory would only cause unnecessary hardship on the industry it is trying to promote. The Commission would be wise to look to Texas for guidance and to approach the other 49 states to follow its lead. In addition, making the individual more responsible for his actions is mandatory for safety to succeed.

Respectfully,



Rodney Reinholdt
Facility Manager

RR:sf