



# RECO International, Inc.

P.O. Box 3-C • San Antonio, Texas 78217  
5680 E. Houston Street • San Antonio, Texas 78220  
Telephone (512) 662-5700 • Telex 272 532 RECO UR • FAX (512) 662-5875

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PROPOSED RULE (54FR 47089)

January 8, 1990

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

TO: Secretary, U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch

FROM: RECO International Inc., License No. L03483  
Radiographers: Norman J. Collins No. 00004  
Arthur J. Carr No. 01075  
Raymon S. Linares No. 01672  
David L. Friddle No. 00959

RE: Proposal to Amend the Rules to Nuclear Regulatory Commission  
Regulation 10 CFR Part 34.11 "ASNT Licensing of Radiographers"

Dear Commission:

The proposal to amend the regulation 10 CFR Part 34.11 of NRC Rules, to allow the American Society for Non-Destructive Testing (ASNT) to license radiographers under third party certification is unwarranted.

We are of the opinion that the ASNT should serve only in its current capacity; establishing minimum guidelines for safety, procedures and practices regarding radiographic activities - NOT as a certifying or governing body.

In the State of Texas, radiographers are required to obtain a license through the State Department of Health before using any radiographic source by demonstrating, by examination, a fundamental knowledge of radiographic safety practices, radiographic procedures and equipment requirements pursuant to Texas Regulations for Control of Radiation Part 31, which exceeds the requirements of ASNT Recommended Practice No. SNT-TC-1A. The licensing procedure now in place in Texas costs \$300 per person, not the \$1000 estimated by ASNT to certify radiographers. Texas has also experienced a reduction in the number of radiation exposures and in our view the program has proven itself a model guide for other states to adopt. ASNT is not a regulatory or governing body and is not equipped to provide anything more than minimum safety and practical guidelines.

To conclude, the licensing of radiographers is most effective and less

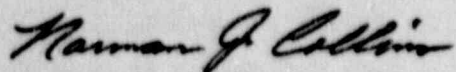
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expensive when left to the individual state under the guidelines established by the ASNT.

Sincerely,



Norman J. Collins  
Radiation Safety Officer

NJC:smm