

DOCKET NUMBER  
PROPOSED RULE

PR 34  
(54FR47089)



UNITED AIRLINES

14

DOCKETED  
USNRC

Maintenance Operations

Secretary, U.S. Nuclear Regulatory  
Commission  
Washington, D. C. 20555

90 JAN 16 P4:14

January 11, 1990

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Attn: Docketing and Service Branch  
2120 L. Street  
N. W. (lower level) Washington, D. C.

Proposed Rule Making 10 CFR Part 34 ASNT Certification of  
Industrial Radiographers

The proposed rule to require third party certification would produce unjust hardships on the airline industry. The air carriers have developed and adopted training programs that reflect ASNT guidelines tailored to airline industry specifics. These are programs that were approved by NRC Agreement States, for each operator. These training programs have been formalized and presented as; Air Transport Association - Specification 105.

Airline radiography programs employ experienced aircraft inspectors who have been trained in the safe use of radiographic equipment. United Airlines for example conducts 4 to 5 isotope inspections and 40 - 50 x-ray inspections per week at SFO. United Airlines has experienced no personnel over-exposures, has received no safety violations, and has passed State of California Radiation Safety audits. The airlines have a radiation safety record that cannot be matched by the radiography industry as a whole.

United Airlines welcomes uniformity of training and if necessary, legislation to mandate that training. However, we also believe the airline maintenance industry has taken upon itself to create training programs and adhere to them. The ASNT program offers no improvement in the current airline program, it would only add increased costs and planning problems.

United Airlines strongly recommends the adoption of rules making third party certification an option in lieu of the operators own approved certification program.

Sincerely,

Bob Scoble  
NDT Manager  
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