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GCT INSPECTION, INC.

DOCKETED  
USNRC

DOCKET NUMBER  
PROPOSED RULE

PR 34

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

January 10, 1990

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

Atten: Docketing and Service Branch  
Re: Federal Register Vol. 54 No. 216  
Nuclear Regulatory Commission 10 CFR Part 34  
RIN 3150-AD35  
ASNT Certification of Industrial Radiographers

Dear Sirs:

We wish to take exception to statements made in the above noted document. Specifically, "Regulatory Flexibility Certification". The statement "the Commission certifies that, if promulgated, this rule will not have a significant economic impact upon a substantial number of small entities." Please be assured that this rule would have severe economic impact on all industrial radiography company "small entities". As a Texas licensee, our company has already incurred the expenses required to certify all our personnel to State of Texas requirements, which meet or exceed ASNT requirements. What is the point in retesting personnel with the same test initiated by a third party.

With twenty-two industrial radiographers employed, and using ASNT estimated cost of \$1000.00 per radiographer, our estimated cost would be \$22,000.00. This expense could change this company from a profitable endeavor to a negative producer. Although unaware of the exact definition utilized by the Commission, I personally consider this "significant economic impact."

If third party certification is adopted why can not radiographers tested by the State of Texas be accepted as ASNT certified?

Your response is eagerly awaited.

Sincerely,  
*G.G. Peloquin*  
G.G. Peloquin

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