

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

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Attention: Docketing and Service Branch

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

Dear Sir,

These comments are submitted to the commission for consideration prior to the passage of the amendment concerning 10 CFR Part 34 "Licenses for Radiographic Operations". It is so noted that this amendment is only intended for those applicants that wish not to submit an initial training program and have their Industrial Radiography Radiation Safety Personnel trained and certified by the ASNT, Inc.

**Certification Program for Industrial Radiography Radiation Safety Personnel**

**National Radiographer Radiation Safety Program**

I am in favor of a standardized radiation safety program. This in itself will save the applicants money and time when submitting a request for license. A pre approved program will also save the NRC money and should reduce the cost of the license. An NRC approved packaged program at a reasonable price that can be administered by the licensee is the first step to a National Radiographers Certification.

**Standardization of Emergency Operating Procedures**

It only follows that this is the logical step that needs to be taken for a National Standardized Emergency Operating Procedure. The money and the manhours that have been spent by applicants preparing and submitting these procedures to the NRC must be in the millions of dollars. The time and money it took for the NRC to review thousands of programs would greatly be reduced. This procedure would free up the resources to better monitor the radiographer and licensees.

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**Concerns: Responsibility and Liability**

- a. The NRC has approved the ASNT program. This means the NRC accepts full responsibility for the adequacy of the program. Currently Part I of the program sells for \$1100. The ASNT Catalog says there are 4 parts to the Program, however, there is no mention of the cost of Parts 2 through 4. I have estimated the cost of ASNT training and Certifying an individual, including loss of income, expenses and benefits to be \$2500. This would put the cost to the industry around thirty million dollars.
- b. The ASNT program does not have to be followed if the Licensee has an approved program. Will the option to use the licensee's program remain an option? Is the NRC going to allow applicants to continue to submit their own programs for initial training?
- c. Third party Certification Agency is going to have the responsibility of testing and certifying the individuals. Yet there is no liability because it is still the licensee who is responsible for actions of the individual. The individual is still protected from the wrath of the NRC and now certified by nationally recognized organization. The certifying agency should be responsible to keep accurate records on individuals that are later found to lack the ability to safely perform as radiographers. The individual employers are at the mercy of the courts if they dare give a derogatory report on a past employee.
- d. The individual radiographer should be made liable for his/her actions. There should be penalties for violating safety procedures such as the removal of certification, temporary or permanent plus additional documented training and retesting before a certification is issued.
- e. Those states that have mandated two person radiography teams have less safety violations than those that allow a single radiographer to operate a source. There are many stories in the industry about what single person has done to get the job done just to save a buck. Those licensees that use one person to go out into the field are taken a lot of chances.

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**Mandatory Third Party Certification**

I like the idea of third party certification if it could be done locally with a minimum of travel expense. Bonded, qualified agents of the ASNT could be made available in each ASNT Section around the country to administer the exam in a timely fashion. This would also give licensees a more convenient way to certify new employees that meet the necessary requirements without having to schedule time in Ohio.



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