

DOCKET NUMBER **PR 34**
PROPOSED RULE **PR**

33



(54 FR 47089)

DOCKETED
USNRC

'90 FEB -6 P5:20

February 2, 1990

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Attn: Docketing and Service Branch

Dear Sir:

I have been a member of the IRRS Committee since its inception, and I am the president of possibly the largest licensee in both non-agreement and agreement states combined. These functions have deeply involved in the issue of Central Certification.

Your promotion of the certification program in the State of Texas which is now considered to be the goal of all regulatory agencies is a major concern to me. The reciprocity that is granted under the Texas Certification program is next to nothing. This type program, if enacted in all 29 agreement states will impact the viability of our company. Therefore, my support for Central Certification is truly forced, that is, if the regulatory agencies each have their own program with no reciprocity whatsoever, national firms such as ours would suffer. Therefore, I would support Central Certification as the only viable alternative as opposed to 29 agreement states certifying personnel.

Philosophically, I do not agree with the certification of radiographers either by regulatory agencies nor by a central agency. The mere fact that an individual is capable of passing a test does not make him a safety minded person. Next, I quote from your publication (NUREG/BR0032, Volume 5, No. 38 - Week Ending September 24, 1985) Paragraph 7 - "After further consideration of this matter and a review of the public comments received on the matter, the Commission has concluded that there is no consensus that such a program would reduce the number of overexposures to radiation resulting from radiography activities and that it would be time-consuming and expensive to implement." What has changed in our industry? It is my belief that our industry's safety record has improved.

9002080251 900202
PDR PR
34 54FR47089 PDR

DS10

U.S. Nuclear Regulatory Commission

Secondly, statistics that have been published after Canada's Central Certification actually shows that the number of incidents increased rather than decreased. Thirdly, details regarding the downward trend in exposures in Texas since radiographers began preparing for tests is extremely misleading. This downward trend resulted mostly from a downturn in the economy of Texas and not safer radiographers. The cost of \$1,000 per radiographer will have a tremendous impact not only on small licensees but also on the large ones. You are dealing with an industry which is extremely cost and price sensitive. People sell radiographers anywhere from \$15 to \$30 per hour. Consider the fact that you pay your automobile mechanic and plumber \$45.00 per hour, our billing rates are extremely low. The licensee who now adheres to good radiation safety practices i.e., training their people, auditing, providing proper equipment will now be impacted by an additional charge on top of what they already spend. MQS which has 300 radiographers plus an additional 100 x-ray technicians is spending approximately 12% of our operating income on its radiation safety program. The impact that certification would have on the profitability of our company as well as many others would be a disaster. Yet, the big question is will safety really improve? I do not believe so!

This will also drastically impact the supply of skilled radiographers available to the American industry. Many employers will say, we will not spend this money, we will only hire a certified individual or pirate same from other companies. This will put the pressure on individuals to certify themselves. Other occupations will be more attractive to some of the better people. In my opinion, there were many vested interests in pushing Central Certification under the guise of improved safety. I am not sure that some personnel of the unions, NRC and ASNT truly believe that safety would improve but rather had other motives. At the last meeting, before the Commission representatives from the NRC and ASNT were present. I feel that expanded representation by the radiographic industry at that hearing would have better served the Commission.

Safety is a state of mind, a philosophy. If top management in an organization does not exhibit and live safety, the technicians that work for them will not either. We as management must show the lead. The regulatory agencies must expand their enforcement activities. The ASNT survey of persons showed that the industry believes that increased enforcement would be the major thrust in improving safety.

Page Three

U.S. Nuclear Regulatory Commission

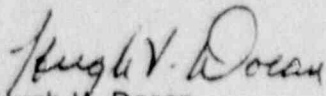
I would like to put forward some suggestions for your consideration in lieu of Central Certification.

- a. random drug testing of all personnel involved in the radiographic industry.
- b. mandated requirements for two man crews.
- c. regulatory listing of all persons involved in violations of severity Level I.

I appreciate that you have given me the opportunity to voice my opinions in regard to Central Certification. I am committed to improving safety for our employees and the general public but do not consider Central Certification as the means to achieve that. The cost will be far too great for to little return.

Very truly yours,

MQS INSPECTION, INC.


Hugh V. Doran
President

HVD/vg