



Department of Human Resources
HEALTH DIVISION

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PROPOSED RULE PR 34
(54 FR 47089)

January 17, 1990

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

ATTN: Docketing and Service Branch

This is in response to the Nuclear Regulatory Commission's notice of proposed rules regarding third-party certification for industrial radiographers (10 CFR Part 34).

The Federal Register, Volume 54, Number 216, dated Thursday, November 9, 1989 refers to the American Society for Nondestructive Testing (ASNT) as being a certifying third-party. Oregon has no particular problem with the ASNT training industrial radiographers for the purpose of passing a certification examination. However, it should be made very clear that ASNT would not necessarily be the only third-party organization who could be recognized for training industrial radiographers. There may be several organizations capable and interested in becoming involved with this training.

There should be no discrimination among trainers. Private training facilities, along with the ASNT, must be allowed to train radiographers as long as their program meets the guidelines of the Texas test.

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

Ray D. Paris
Manager
Radiation Control Section

RDP:clh

cc: Carlton Kammerer, NRC
Director, State, Local and Indian Tribes Program

Jack Hornor, NRC, Region V
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