

DOCKET NUMBER PR 34
PROPOSED RULE

35



(54 FR 47089) DOCKETED
USNRC

'90 FEB -6 P5:18

February 2, 1990

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Attn: Docketing and Service Branch

RE: ASNT Certification of Industrial Radiographers

Dear Sir:

I have been in the NDT business for 34 years with one company and am Executive Vice President of MQS Inspection, Inc. During this time, we have grown from zero radiographers to approximately 300. We have always had an excellent safety program with good control and management has always had great concern for operating safely. This has been very expensive but has kept us out of trouble.

I totally disagree with those who say lack of training is the cause of over exposures. I believe you will find the greatest cause to be the radiographer not following procedures, or equipment problems. You can give an individual all the training in the world but if he doesn't follow the procedures, it is of little value.

Everybody is using the State of Texas program as an example of success. Up until the time they started this program, Texas was the most unsafe state in the union to do isotope radiography followed by Louisiana. Any changes made by Texas would have to show improvement but the program has not been in operation long enough to claim it is a success story. They are still having incidents.

I have been opposed to Central Certification since the start but I am very much in favor of doing something to improve the industry's safety record. Some recommendations are:

1. Make it more difficult to get an NRC License.
2. More unscheduled audits by the NRC.

9002080301 900202
PDR PR
34 54FR47089 PDR

DS10

Page Two

U.S. Nuclear Regulatory Commission

3. More enforcement. If somebody is deliberately working unsafely, he should not be doing radiography. We can get rid of the bad actors if you make it a requirement that all incidents be reported along with the name of the individual involved. You keep his record, if he has another incident you may want to ban him from doing any further radiography. Advise the industry of this and the individual - he would be out of the business.

4. Make it mandatory that two man crews be used.

5. There are companies in the business who have broken every law in the book where management was aware of what was going on. They were not spending the money to run a safe operation. They are still going - this should not be, it is unfair to those who run safe operations, U.S. Testing is an example.

6. Get somebody in this section of NRC who has been in the field and knows what he is up against, not a retired military man going for a second retirement.

You are the enforcement agency. Nobody else can do your job for you. We will do our job and if you do yours we will have a safe industry.

Very truly yours,

MQS INSPECTION, INC.

Ronald C. Faloon

Ronald C. Faloon
Executive Vice President

RCF/vg