

Tenneco Gas

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Service Branch

Gentlemen,

Tenneco Gas is one of the Nation's major transporters and sellers of natural gas. Tenneco Gas, through its various systems, operates 16,796 miles of gas transmission pipelines serving the major population centers of the eastern half of the United States.

Tenneco Gas maintains its own internal industrial radiography program consisting of twelve radiographers and five radiographer assistants or trainees. Additionally, Tenneco Gas maintains eight radioactive materials licenses from the NRC and several Agreement States.

We have recently reviewed the NRC proposed amendments to 10 CFR Part 34 as published in the Federal Register Volume 54, Number 216. While we support and are in agreement with a strong nationally accepted program for certifying radiographers, we do not believe the ASNT program will accomplish this end. The following are our comments and recommendations concerning this issue:

1. Program Compatibility

In addition to being an NRC licensee, one of the several Agreement State radioactive material licenses we maintain is with the State of Texas.

Texas has already established a proven and successful certification program for radiographers which has requirements that are stricter than those in the proposed ASNT certification program. We understand that the pilot program within the State of Texas was partially funded by the NRC.

2. Potential Conflict Of Interest

We believe that ASNT has very good intentions in offering to help the industry and regulatory agencies with the problem of radiation safety training and the certification of radiographers. We also believe they would have a serious conflict of interest since they represent those already established in the business, many of whom are involved in the training of those who are entering the business.

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3. Unresolved Issues of Concern

- a. Who will have the power to revoke certifications and for what reasons?
- b. What sort of documentation will the radiographer be required to provide to document initial and/or annual radiation safety refresher training?
- c. Will annual radiation safety refresher training courses also have to be certified, and if so by whom?
- d. Would a radiographer who has already been certified under a more stringent Agreement State program really be required to be certified under a less stringent ASNT/NRC program? This would seem to be detrimental to the interest of radiographer safety.
- e. Would NRC licensees which presently have approved radiographer training programs and no past history of any violations that have been attributable to insufficient or inadequate radiographer training really be required to submit to ASNT/NRC certification on a mandatory basis? What purposes would this serve?
- f. Why does the ASNT proposal only provide for two areas of radiographer certification? It would be less expensive for the radiographers and licensees if consideration were given to offering three types of certifications (similar to the Texas program), such as:
 - 1.) isotope
 - 2.) x-ray
 - 3.) combination isotope & x-ray

These and similar issues must be adequately addressed before any requirement for national radiographer certification can be effective.

4. Recommendations:

- a. The NRC should fully recognize the Texas program and establish a reciprocal agreement whereby certified radiographers or licensees from the State of Texas, or other approved and established compatible programs, would be recognized by the NRC and other Agreement States, similar to the reciprocal agreement presently established for radioactive material licenses. This would prevent the unnecessary costs and redundancies of having multiple radiographer certifications.
- b. The NRC should consider modeling their proposed radiographer certification program around that of the State of Texas, and consider the utilization of the Conference of Radiation Control Program Directors or other similar groups, without potential conflicts of interest, as the third-party organizations to provide radiographer certification administrative services.
- c. The NRC might consider authorizing more than one organization to act as a third-party certifying agency for the NRC. This would encourage competition and prevent one organization from establishing a monopoly on radiographer certification which would be detrimental to the industry.

- d. The NRC should require that any third-party certification organization for the NRC should not be directly or indirectly involved in any type of radiation safety training which could result in a conflict of interest.

We do not believe the ASNT program will accomplish the NRC's stated goals and feel that it will create great expense and problems for the industry.

If you have any questions, please feel free to call me anytime at (713) 662-5353.



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