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

Dear Sir,

This letter is in regard to the notice of proposed rule changes to make ASNT responsible for certification of industrial radiographers as published in the Federal Register of 9 November 1989 (54FR 47089).

I do not believe this approach is the answer to improving the safety record of the industrial radiography industry. To bring in another society to be in charge of conducting a safety program is not in the best interest of the NRC or the industry.

ASNT has yet to attain complete order in their own certification program let alone take on regulatory responsibilities that they have no business getting into.

I suggest, in the interest of safety, the NRC consider requiring that, as a minimum, two individuals, one a radiographer and the other a radiographer's assistant be required at a field site where isotopes are in use.

It is too much for one individual to be responsible for getting the job done in a timely manner and be concerned with safety. When one individual tries to do too many things or keep track of too many thoughts, items are forgotten. If safety steps are overlooked the result could be disastrous.

I have been performing industrial radiography in the field for 26 years, therefore I have personal knowledge of what I speak. This is already a requirement in many of the states that we perform radiography in.

Very truly yours,

*Kenneth F. Baker*

Kenneth F. Baker  
Radiation Safety Officer  
ASNT Level III DA-733

KFB/ndb