



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39202

August 6, 1982

NUCLEAR PRODUCTION DEPARTMENT

Secretary of the Commission
Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Sir:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
Certification of Radiographers
File: 0260/12260
AECM-82/220

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DOCKET NUMBER
PROPOSED RULE PR-34

(47 FR 19152)

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Mississippi Power & Light Company (MP&L) is responding to your proposal to require certification of radiographers, appearing in the May 4, 1982, release of the Nuclear Regulatory Commission (NRC) Region II Office of Public Affairs and in Volume 47, Page 19152 of the Federal Register.

MP&L shares the concern of the NRC that exposures to the public be kept As Low As Reasonably Achievable (ALARA). It is apparent, from the disproportionate number of overexposures related to industrial radiography, that this is a problem in need of a remedy.

MP&L, however, believes that implementation of a third-party certification program will not significantly reduce the incidence of overexposure unless there are means of encouraging continued good practices on the part of the radiographers and measures to remove chronic violators from the industry. We, therefore, favor a national registry to assist licensees in determining the qualifications and exposure records of applicant radiographers. Augmented efforts by the NRC to inspect radiographers as a target group may also be prudent, in view of their history of radiological overexposures.

If these efforts to reverse this trend are not effective within a reasonable period of time, then, and only then, should third-party certification, which will undoubtedly directly or indirectly increase the costs of these individuals' services, be considered.

If you have any question, please contact this office.

Yours truly,

L. F. Dale
Manager of Nuclear Services

DS 10

add: James Jones
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PJR/JDR:lg

cc: (See Next Page)

Member Middle South Utilities System

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MISSISSIPPI POWER & LIGHT COMPANY

cc: Mr. N. L. Stampley
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Mr. Richard C. DeYoung, Director
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