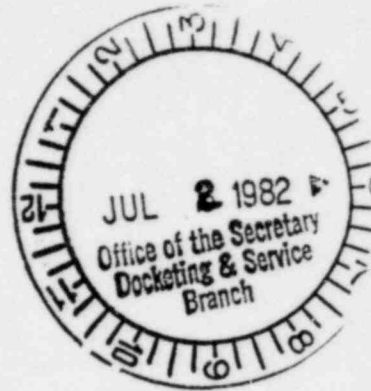


**MCC PACIFIC SOUTHERN  
FOUNDRIES**

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June 25, 1982

DOCKET NUMBER

PROPOSED RULE

PR-34 (36)  
(47 FR 19152)

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

Attention: Docketing and Service Branch

Gentlemen:

Attached are our comments concerning the proposed NRC rulemaking on the certification of industrial radiographers.

The comments are those of our radiography department foreman, who is involved with radiography of steel castings, using IR 192 (100 curies), and a Varian Linatron 200 (2 MEV).

I hope that these comments will be of value to you in assessing the proposal for third-party certification.

Yours truly,

MCC PACIFIC SOUTHERN FOUNDRIES

A handwritten signature in cursive script, appearing to read "Ed Barrs".

Ed Barrs  
Chief Metallurgist

EB/m

Attachments

Acknowledged by card... 7/9/82 mdv

DS10  
James Jones  
5650 NL

8207130325 820625  
PDR PR  
34 47FR19152 PDR

ATTACHMENT

In-house radiography should not be subject to the same form of rules as field RT.

Field RT must have a sound safety practice because the chances of over-exposure are much greater and trainees are often left without the attendance of a licensed radiographer.

In-house radiography works under a different type of environment. For example (valve castings), radiographers must work directly with their trainees. Not only because of the safety aspect, but trainees must also learn how to layout for RT, the hundreds of different types and sizes of castings, and also learn the many different specs involved with valve casting RT. At all times being exposed to the importance of radiation safety.

I believe field radiographer trainees should be subject to a third party certification, with an open book type of training and testing, so the trainee knows the answers to safety related questions and not have to guess or go doing research for answers.

I feel in-house radiographer trainees need not be subject to a third party certification. I feel they will be adequately trained in RT safety in the process of learning their prospective jobs.

1. See attachment.
2. In field radiography it could, especially to the trainee himself because he would be more aware of the possible results.
3. I think only for a short period of time, in field RT there is a lot of repetitive x-ray work (example-pipeline). Most individuals get into a routine and are not thinking safety at all times as they should be.
4. See attachment
5. I do not think a third party of a certification program would want to, or even be a part of, determining the competence of an individual. A certification program should be for general radiation safety procedures and not for indepth study of radiation theory as required for a radiation safety license. The competence of an individual, if he or she can perform safely, should be determined by the employer.
6. The line on where to start the program must be drawn somewhere. I feel individuals hired or rehired after the creation of such a program, need be subject to certification program. That for rehired individuals may be subject to waiver upon employer's request.
7. A lifetime certification should be issued and acceptable on any job.
8. Manpower needs can always be filled with an effort. I do not think it would effect anything in this manner.
9. A cost to the licensee would be warranted, but it should be very small. The reason being I feel it should only be a one day radiation safety class and not an indepth radiation safety course.
10. See attachment
11. I think that the present California Radiation Control Regulations through the Department of Health Services, Radiation Safety Enforcement is very sufficient.  
  
Action against unsafe radiation equipment and procedures should be left up to the Department of Health and the individual licensed employers.
12. Radiation safety is radiation safety no matter what the size of the licensee.
13. This would have to be determined after a base is established as to exactly what the functions of a third part certification are going to be.