

ALLIED

INSPECTION

SERVICES, INC.

P.O. BOX 268 ST. CLAIR, MICHIGAN 48079 • 313-329-7535
Midland Office 1-517-832-8850
1-517-832-8859

DOCKETED
USNRC

August 4, 1982 82 AGO 20 A9:53

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Attention: Docketing and Service Branch

Subject: Comments on the May 4th, 1982 Publication
(47 FR 19152). 10CFR Part 34 Certification of
Industrial Radiographers. Advance notice of
proposed rulemaking.

DOCKET NUMBER
PROPOSED RULE

(54)
PR-34
(47 FR 19152)

Dear Sir;

As invited in the subject publication, the following are our comments to your indicated areas of concern in the order listed.

1. We, as managers of Allied Inspection Services feel our training and certification program is sufficiently adequate.
2. I doubt if it would have a significant impact on the reduction of overexposures.
3. This, in my opinion, is the major factor in overexposures. In most of the reports on overexposure that I have read the major cause was operator error. If industries management cannot motivate their radiographers to work more safely I doubt if third-party certification can. Possibly stiffer penalties to radiographers themselves could motivate them.
4. Third-party certification would remove a small portion of responsibility from management but in many cases, would not allow for the selectivity management now has in certifying radiographers. A large part of our certification program depends on observing our

DSIO
Add: James Jones
5650 N

8208300172 820804
PDR PR
34 47FR19152 PDR

Notified by card...

8/25/82 emp

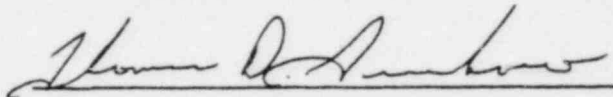
No. 4 contd

employees in the field, how they react to different work situations and environments. Third-party certification would not, I feel, allow for this.

5. Obviously, written examination would be required, however some means of verifying field requirements and the right "safe work attitude" should be included.
6. Everyone - There are radiographers in our industry who are not qualified, and not to include them would be a mistake. Unqualified, unsafe radiographers contribute heavily to overexposures.
7. Renewals should be provided for, to update knowledge of new equipment, changes in NRC Rules and Regulations, etc.
8. It may or may not - we experience difficulty now in responding to manpower needs.
9. We feel the cost should be the responsibility of the radiographers.
10. The present system is preferred. It allows for more selectivity on managements part.
11. Although the licensee is ultimately responsible, the radiographer also has a responsibility to the licensee, his fellow workers, customers and the general public. If he knowingly and willfully performs in such an unsafe manner as to cause overexposures, and guilt is proven, the penalty could consist of loss of employment, a fine of some sort, or criminal action possibly. He should also be protected, by some means, from the employer (licensee) who orders him to operate against NRC Rules and Regulations and his own license.
12. Not if Item #9 is followed, otherwise yes, we feel the small licensee would.
13. Implementation costs would be hard to estimate, however if you consider time attending certification program and testing, travel costs, expenses and tuition or certification fees you will probably face a cost of \$1,200.00 or more per radiographer.

In closing, we feel the present system is preferred for certification of radiographers. Third party certification would probably rely heavily on a written test for final evaluation of a radiographer qualifications. We feel attitude toward personal and public safety, proper work habits and responsibility are factors that can only be properly evaluated in the field under actual working conditions. Third party would not allow for this. Again we feel the present system is preferred.

Thank you,

A handwritten signature in cursive script, appearing to read "Thomas D. Grashaw", written over a horizontal line.

Thomas D. Grashaw
Assistant R.S.O.
Allied Inspection Services, Inc.
License No. 21-18428-01