

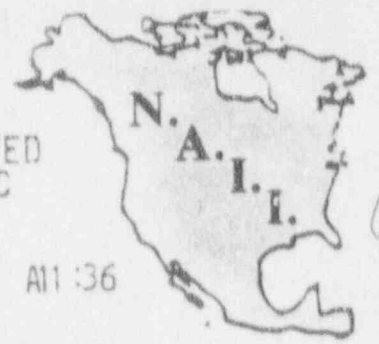
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(59FR9429)

North American Inspection, Inc.

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DOCKETED
USNRC



'94 MAR 28 A11:36

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

March 24, 1994

Secretary, US Nuclear Regulatory Commission
ATTN: Docketing and Services Branch
Washington, DC 20555

Re: Proposed Rule: Central Certifications

Gentlemen:

I have tried my best, over the past few years, to understand the reasoning behind a need for a National Certification Program. I still don't understand or agree that one is needed.

Any company that is working in full compliance will have no need for any additional training or work time experience in order to take the test. So, what are we gaining?

This last year I tested four (4) people with a Texas card and their scores were no better than average. I had two (2) young men that moved from Assistants to Radiographers who scored ten (10) points higher on their test.

Let me remind you of NRC Information Notice No. 91-49, August 15, 1991, bottom of Page #2. This notice urges us to make a minimum of four (4) audits per year and indicates that this is the only way we can insure that licensed material is being used in a safe manner.

I wholeheartedly support this theory. I have conducted many field inspections that have noted areas of non-compliance on radiographers that have had 150 to 200 documented training hours, so training is not my main concern. The proof is how a radiographer conducts himself on the job site.

OS10

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North American Inspection, Inc.

Now you tell me, that if a man passes someone elses test that I can set back and relax, and only make one (1) inspection per year. I don't think so!

Sincerely,

NORTH AMERICAN INSPECTION, INC.

Don B. Shumway

Don B. Shumway
Radiation Safety Officer
NRC License No. 37-23370-01

DBS/ces