



**H & G INSPECTION COMPANY, INC.**

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DOCKETED  
USNRC

March 23, 1994

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PROPOSED RULE PR ~~34-150~~  
(59FR 9429)

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Secretary  
U.S. Nuclear Regulatory Commission  
Docketing and Service Branch  
Washington, D.C. 20555

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Re: Proposed U.S. NRC revision of 10 CFR Part 34

To Whom It May Concern:

H&G Inspection Company, Inc., is an industrial radiography firm based in Houston, Texas, with branch offices in Evanston, Wyoming, and Flora Vista, New Mexico. We have licenses to use radioactive material and perform industrial radiography under federal jurisdiction (NRC RAM license # 42-26838-01), and in the agreement states of Texas (Texas RAM license # LO2181) and New Mexico (New Mexico RAM license # IR268-08). In addition, we perform radiography in many other states through reciprocity of one of our licenses. We have read the proposed federal rule changes to 10 CFR Part 34 (Industrial Radiography), and would like to comment on them.

First, the NRC proposes a mandatory two man crew to be present whenever radiography occurs at temporary job sites. H&G Inspection is in complete agreement with this regulation. We are already required to do this in Texas under current Texas regulations, and have found this practice to be beneficial to the safety of our employees.

The NRC would also require mandatory certification of radiographers. This is also currently practiced in Texas, but we have found absolutely no correlation between radiographer certification and decreased incident rates. In fact, there has been little or no evidence statewide to support the claim that the costly and redundant practice of mandatory certification has any effect on the safety of radiographers or the public.

H&G Inspection would like to point out that we have no qualms against instituting a procedure that produces a measurable safety benefit to our employees or the public, just so long as it is effective. In Texas, we are required to send prospective employees to a 40 hour class on radiation safety. This is a somewhat costly program, but it has proven to be a useful tool in training personnel and, subsequently, decreasing incident rates. In short, we support any proposed regulation that will help alleviate the number of high radiation exposure incidents in industrial radiography. We strongly feel, however, that mandatory radiographer certification is not one of these beneficial regulations.

If, however, radiographer certification does become a requirement, H&G Inspection would prefer some system of certification that does not require as a precondition membership in the American Society for Nondestructive Testing (ASNT). Mandatory membership in ASNT would seem to be a blatant attempt at generating revenue for a "voluntary" society, and is completely unnecessary in the certification process.

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Also, the NRC would like to implement new regulations concerning alarm ratemeters. Requiring that these devices produce a tactile vibration in addition to an audible warning appears to be a logical and effective safety regulation. However, the NRC had previously required and approved of the old model ratemeters, which became a financial responsibility of each independent industrial radiography company. Having now found the old model to be unacceptable, the NRC has changed its position, which implies its culpability to setting poor standards in the past. This being the case, it is the opinion of this company that the NRC should be financially responsible for this new regulation. The outdated ratemeters will be rendered useless by the new regulation, and represents a sizable waste of money which is directly attributable to the NRC. H&G Inspection will wholly support this proposition if the NRC agrees to pay for the new equipment.

Thank you for your consideration in these matters.

Yours Truly,

Harry W. Gibson  
Radiation Safety Officer