

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

DOCKETED  
USNRC

O. W. DIXON, JR.  
VICE PRESIDENT  
NUCLEAR OPERATIONS

September 15, 1982

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*emp*

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Mr. Samuel J. Chilk  
Secretary of the Commission  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

DOCKET NUMBER  
PROPOSED RULE

PR-34

(79)

(47 FR 19152)

Attention: Documenting and Service Branch

Subject: Virgil C. Summer Nuclear Station  
License No. NPF-12  
Comments on Proposed Rule  
"Certification of Industrial  
Radiographers"

Dear Mr. Chilk:

South Carolina Electric and Gas Company (SCE&G) has reviewed the Proposed Rule and offers the following comments to the thirteen (13) NRC questions in the "Invitation to Comment:"

- Question 1 - The available training for radiographers is excellent.
- Question 2 - A third party certification would not reduce the number of overexposures in the radiography industry.
- Question 3 - A third party certification would not motivate radiographers to work more safely.
- Question 4 - The present system is satisfactory for radiographer training. There exists flexibility for the establishment of in-house specialized training as well as the use of outside training agencies.
- Question 5 - If a third party certification program is adopted, familiarity with equipment should be emphasized in determining the competence of individuals to act as radiographers.

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add James Jones  
5650 NL

Acknowledged by card 9/23/82 *emp*

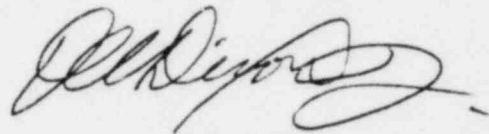
- Question 6 - If a third party certification program is adopted, it should be mandatory for new radiographers, and apply to previously certified radiographers within an established time frame.
- Question 7 - If a third party certification is adopted, it should be issued to individuals for life, based on a predetermined minimum application period at which time the radiographer must be recertified.
- Question 8 - The third party certification program would affect the availability of a licensee to respond to variable manpower needs.
- Question 9 - The cost of a third party certification program to the licensee would not be warranted although, in all probability, the licensee would eventually be required to financially support such a program.
- Question 10 - The present system is preferable because of the prerequisites in training, procedures and other controls already established and the commitment of the licensee at this time to assure a safe and controlled radiography program.
- Question 11 - Radiographers who do not operate equipment safely or follow established procedures, should be terminated. The licensee should be committed to such action through its radiography program. NRC enforcement actions should not be necessary.
- Question 12 - A small licensee may bear a disproportionate adverse economic impact under a third party system depending upon the extent of licensee radiography involvement versus that of contract services.

Samuel J. Chilk  
September 14, 1982  
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Question 13 - Although we cannot estimate the cost of implementing a third party certification program, our feeling is that the costs would significantly outweigh the benefits.

If there are any queries concerning these comments, please contact us.

Very truly yours,



O. W. Dixon, Jr.

/fjc

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