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USNRC

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11 May 1982

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Attn: James A. Jones

PROPOSED RULE PR-34

(90)

(47 FR 19152)

Dear Sir:

Associated Technologies Incorporated's Health Physics Services Division would like to take this opportunity to comment on the proposed rule published in the Federal Register, Volume 47 Page 19152, dealing with third party certification of radiographers.

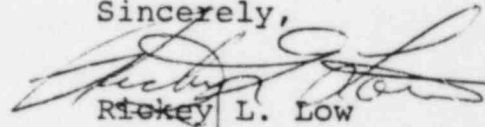
It is our collective opinion that this measure would be an excellent step in the direction of safety. Our staff personnel have in the past been an Industrial By-Product Licensee for Radiography and recognize many of the pitfalls associated with these programs. We therefore, support this proposed rule highly. Also, we recommend requiring an audit program for certified radiographic personnel on a quarterly basis. This would add the needed quality assurance factor. Formal written audit reports would then be submitted to the Licensee and the NRC on a standardized written form. This approach, in our opinion, would be necessary if the certifying entity's program has any legal liability after an individual is certified under that program.

It is our belief that radiographic work and training be of the utmost caliber to ensure not only the safety of radiographic personnel but, more importantly, personnel around radiographic operations.

If ATI's Health Physics Services Division can be of any further assistance to you during the rule making process please feel free to contact us at the following:

ASSOCIATED TECHNOLOGIES INCORPORATED
Health Physics Services Division
55 Wheeler St.
Cambridge, MA 02139
Attn: R.L. Low or G.R. Larson

Sincerely,



Riekey L. Low
Asst. Manager Health Physics
Services Division

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add: James Jones
5650 N.J.

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