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Chemical, Materials and Geotechnical Engineers Laboratories

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BRANCH

May 21, 1982

Mr. Aubrey V. Godwin, Director
Division of Radiological Health
Department of Public Health
State Office Building
Montgomery, Alabama 36130

DOCKET NUMBER PR-34
PROPOSED RULE (47 FR 19152)
81

Subject: Certification of Industrial
Radiographers,
NRC 10 CFR Part 34

Dear Aubrey:

Thank you for sending us the copy of Advance Notice of Rulemaking on the Certification of Industrial Radiographers.

I think the suggested change will be ineffective for the purpose intended, and therefore the employment of a third party as an examiner would be an unnecessary burden.

The present system is adequate.

In my 28 years of managing radiographic services, I have found that the intellectual training given in the past has been effective. Anyone having been given the training and subsequent written test would unhesitatingly recite the correct safe procedures for handling by-product material.

The preponderance of over exposures have occurred because of job pressure to hasten and increase productivity of radiographs, and/or making assumptions of safe storage.

Control of this weakness is solely in the hands of the employer of the radiographer.

The present system for control has proven healthy and effective for us.

I would suspect that those employers who have had multiple and frequent over-exposures have not enjoyed the supervision we have experienced under your office.

We are "agin" the suggested third party certification.

Sincerely,

VESTER J. THOMPSON, JR., INC.
W.S. Thompson, Jr.

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VJT/cg

CC: Mr. James A. Jones - Nuclear Regulatory Commission

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add: James Jones
5650 NW