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Mr. James A. Jones  
Office of Nuclear Regulatory Research  
Nuclear Regulatory Commission  
Washington, D.C. 20555

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Dear Sirs:

This is a response to the invitation to comment concerning the desirability of establishing a third-party certification program for industrial radiography. Responses have been limited to areas specifically requested in the document.

1. The quality of training programs provided to industrial radiographer many times vary with the size and economic stability of the company. Many companies can not afford to have the staff which is necessary for training. This makes scheduling of employees into training somewhat erratic, because there is no required established system which could provide the services which are necessary for training. Radiation training and protection for workers should not be a commodity predicated on time, qualifications, or economic stability. All workers should have basic training provided by qualified instructional staff.

2. There is no guarantee that third-party certification would reduce overexposures in the radiography industry. However, all studies which have been conducted on radiation workers have shown that education and training do reduce radiation exposure levels as the workers understand the implications of same, and also know how to protect himself and others.

3. Motivation of employees can not be legislated or regulated into existance. Third-party certification would assure that all industrial radiation workers have been taught the basic skills of protection and the consequences of sloppy work. This would eliminate accidents which are based in ignorance and give a common basis for radiation safety practices. Over a period of time as the awareness of the workers is increased, exposure levels will diminish. This has been observed in all improved training programs.

4. The major elements in the present system which are undesirable are connected to the lack of emphasis placed on understanding the health hazard which exists and many training personnel who do not have the scientific background or training to teach this to others. Radiation Safety Officers may be excellent in operation, but they are not educators and in many cases may not understand how to make the information relevant for the many levels of students which they teach. Other trainers may leave the learning to the individual and offer no assistance in mastering the information.

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5. Items which should be included in the standard for determining the competence of individuals to act as radiographers are biological effects, radiation protection procedures, basic radiation safety, basic calculations which are required for radiation protection, handling procedures, storage and transportation requirements and area monitoring. Some basic information about dosimetry and regulations are also necessary.

6. Adopting a third-party certification system which does not include the presently working radiographers would not accomplish the goal for which the policies and procedures, the competency of such individuals as well as the work force should be proven. This could be done with simple testing. Those persons with adequate credentials of training from outside their companies could be grandfathered. If this is economically unfeasible to implement because of the numbers involved, all should be required to demonstrate competence.

7. Initial certification should be renewable every three years. There is no safety program in existence which is successful if it is not continually updated and emphasized. We tend to forget one-half of everything learned every five years. All training is invalid if some method of refresher is not included in a program.

8. The question of manpower needs is always asked when a requirement of training is established. It is better to ask if we can afford to continue under the circumstances which have produced our situation. Problems which will be inherent in the system as it is started should disappear as the number of certified industrial radiographers increase. A grace period of two years implementation should allow ample time for compliance.

9. Why should the licensee carry the whole burden of cost of this program? The individual radiographer should bear all or some of the cost of his training.

10. The third-party certification is preferable because it will allow the training to be done by those who are qualified. Educators are trained to produce relevant training programs. It is their business to know how to educate, and the content of the program will be more standard than at present. The variations and inadequacies of programs at this time are related to non-standardization of content and lack of qualified instructors.

11. Enforcement action or disciplinary action would have to be implemented by the regulatory agencies contingent on the seriousness or negligence involved in any potential or actual situation. Due process must be assured and a hearing process is a necessary part of this system. In all such systems now in place, the existence of such a system is a deterrent in itself.

12. The small licensee should benefit more from the third-party system than the larger licensee. The small licensee is already at a disadvantage because they can not provide the time, staff, or materials for training in an adequate manner.

13. The cost of implementation of such a program would be minimal for those organizations who are already in the business of education. Costs would include materials, research, and staff. This can be done jointly with the industry which requires these services.

The implementation of a third-party certification system will improve the basic standards of education. Through improved education and training, radiation safety awareness will reduce the number of accidents and lower the personnel radiation exposure levels.

Our company specializes in safety training and we are prepared to step into the educational area of industrial radiography.

Sincerely,

HOUSTON EMS ACADEMY, INC.

*Marilyn H. Sackett*

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