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PROPOSED RULE **PR 34-150**

(59 FR 9429)

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Attention: Docketing and Service Branch

Dear Sir:

These comments are in response to a proposed amendment in
10 CFR, Part 34.

I have been involved in the NDT industry for seventeen years;
ten years of this time as a radiographer and seven years as a
service technician involved in the manufacture, repair, calibration
and service of radiation detecting equipment used in industrial
radiography.

In Part 34.25, Par b and Sub 1, the licensee shall have each
radiation survey instrument required under Par (a) of this section
calibrated -

(1) At intervals not to exceed 6 months and after instrument
servicing, except for battery changes:

Radiographic equipment at temporary job sites is subject to severe
service on equipment at most locations. Survey instruments and
personal radiation detection equipment is subject to shock,
vibrations, foul weather and the rigors of normal use.

In my experience, most instruments require adjustments at the
required three months intervals. Some instruments require repair
before a calibration can be performed. Most instruments also
require adjustments related to the reliability and performance of
the instrument.

Since defective and/or inaccurate equipment has been related to
accidental exposures, and Part 34 is intended to provide additional
safety levels to the radiographer and public, this proposal seems
to contradict that, since the instrument would be in the field for
twice the time as was previously required before calibration.

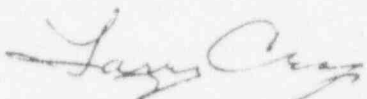
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Regulatory Commission
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I suggest the only changes that could safely be made to calibration intervals on radiographic survey instrument is 6 month intervals, at permanent locations or lab type facilities where controlled environments and conditions exist.

The survey instrument is the radiographers main tool so to speak, for the safe use of exposure devices, and its effectiveness should not be compromised or overlooked for any reason.



Larry M. Craig RSO
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