

American Airlines

MAINTENANCE & ENGINEERING CENTER

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PROPOSED RULE PR 34 + 150
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March 31 ~~1994~~ OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary, U.S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, DC 20555

Subject: PROPOSED CHANGES TO 10 CFR PART 34
Federal Register/Vol. 50, No. 39/ Monday, February 28, 1994
Reference ME94-21

1. Radiographer Certification (34.43 Training)
 - A. Requirements for an Independent Certifying Organization.

Discussion: It has not been clearly demonstrated that a radiographer certification program will reduce over-exposures in industrial radiography. This proposed rule does not clearly define which certifying agencies, Agreement States, Non-agreement States providing test through CRCPD, and Qualified Organizations are recognized by the NRC.

In NUREG-0713, Vol. 14, Occupational Radiation Exposure at Commercial Nuclear Power Reactors and Other Facilities 1992, Table 3.3, Section 3-7 indicates that 99.6% of Monitored Persons received less than 2 cSv (rem). This is well below the limits established by the NRC. It further stated that 99.99% of the workers received less than 5 cSv (rem). The majority of the radiographers are complying with the current rules. Enforcement of current regulations will provide the necessary protection for industrial radiographers and the public.

For the above reasons we oppose the proposed rule change.

2. Leak Testing (34.27)
 - A. Depleted Uranium (DU)

Discussion: We agree with the proposed rule, but it has certain limitations as described below.

Leak testing with available kits will indeed test for a leaking source or contamination from the depleted uranium. However, my understanding is that such a test will not discriminate between contamination from the DU material and a leaking source.

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3. Transportation of Source Material (34.35)

Discussion: We agree that transportation of source material should be included in the proposed rule. However, DOT regulations for transportation of sealed sources and placarding of vehicles should be included in the new proposed regulations. It should be stated that a lead overpack box, secured to the vehicle, be labeled as to the amount of radiation present on the surface and at three feet. The vehicle would then be placarded accordingly. This method is described in NUREG/BR-0024, Working Safely in Gamma Radiography, Sept. 1982, by Stephen A. McGuire (NRC).

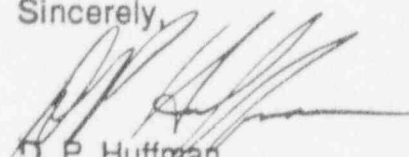
4. Personnel Monitoring (34.47)

Discussion: We disagree with the proposed rule as written. Please consider the following logic for the new regulation.

Pocket dosimeters with a full scale reading of 200 milliroentgens are needed to accurately record small doses. However, another dosimeter of a higher reading will always show the actual amount of radiation an individual received. It serves no purpose to stop an individual from working, until his film badge has been processed, when he actually received only 200 mR. Because pocket dosimeters are susceptible to go off scale accidentally, radiographers should wear a 200 mR and a 500 mR dosimeter. The individual would then only be removed from service when his exposure is in question or he exceeds his annual dose limit.

In summary, it appears the new rule changes and additional fees required, will put more licensees out of business. Since the new fee structure was mandated by Congress this past year, more than 2300 businesses have not renewed their licenses. American Airlines found it too costly and burdensome to continue Isotope Radiography at the DFW Airport. This same condition is becoming apparent at the LAX Airport and may be discontinued within the next year. The majority of companies are complying with regulations and have excellent safety records. Enforcement of current regulations is needed rather than the addition of greater burdens.

Sincerely,



J. P. Huffman
Vice President
Engineering and QA

BWN/DPH/kls
cc: S. R. Erickson, ATA