



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

AE07-1 PDR 009

JUL 29 1991

MEMORANDUM FOR: The Chairman  
Commissioner Rogers  
Commissioner Curtiss  
Commissioner Remick

FROM: James M. Taylor, Executive Director for Operations

SUBJECT: REVISION OF 10 CFR PART 34

On April 25, 1991, the Commission approved the staff proposal to undertake a revision of 10 CFR Part 34, "Licenses for Radiography and Radiation Safety Requirements for Radiographic Operations," and requested the staff to inform the Commission of the schedule for this rulemaking. The Office of Nuclear Regulatory Research has been working closely with NMSS and GPA staff and has solicited comments and suggestions regarding needed changes from the Agreement States, NRC Regional Offices, and selected users and manufacturers. The staff is continuing to receive these suggestions.

The comments and suggestions from regulatory groups, users, and manufacturers of radiography equipment have resulted in a large list of issues and topics to be addressed in the revision. A list of the major issues is enclosed. The staff has formed an informal working group with members from RES, NMSS and GPA to examine the issues, prioritize the comments, and prepare an options paper for rulemaking development. This group will also review the Texas, Canadian, and Conference of Radiation Control Program Directors (CRCPD) regulations per the direction in the April 25, 1991, SRM. The options paper will outline the intended direction for the revision, evaluate the costs and benefits of possible regulatory approaches to the issues, and will serve as the basis for rulemaking. I anticipate that this process will take approximately 3 months. Based upon this approach, an estimated schedule for the rulemaking is as follows:

October 1991	Completion of Options Paper
May 1992	Office Review and Concurrence on Proposed Rule
June 1992	Proposed Rule to EDO
July 1992	Proposed Rule to Commission
Fall 1993	Publish Final Rule

The resources for the review of issues and conduct of rulemaking are included in the Draft FY 1992-1996 Five-Year Plan. It is estimated that 2 FTE will be necessary to complete the rulemaking.

Original Signed By:  
James M. Taylor

James M. Taylor  
Executive Director  
for Operations

Enclosure:  
List of Major Issues

cc: OGC  
SECY

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MAJOR ISSUES FOR CONSIDERATION IN THE REVISION OF 10 CFR PART 34

- Definition of "Temporary Job Site."
- Definition of "Permanent Radiographic Installation."
- Qualifications required of a "Radiation Safety Officer" (RSO).
- Whether to require two-man crews (both to be qualified radiographers).
- Whether recovery of disconnected sources should be a topic added to training requirements.
- Whether to require surveys of transportation vehicles transporting radiography sources and equipment.
- Whether to require audible and visual alarms.
- Specification of radiographer trainer requirements and experience.
- Documentation of radiographer retraining.
- Whether to require leak testing of sources after incidents involving disconnected or stuck sources.
- Whether to require notification by telephone to NRC of temporary job site locations prior to use.
- Whether to require maintenance of job site records.
- Whether to require maintenance of facility records.
- Whether to require transport of radiographic devices to be under the direct supervision of a radiographer.
- Whether to require documentation for daily inspection of control assembly and guide tube of radiography camera.
- Whether to require documentation for daily inspection of all survey instruments in use to assure proper operation.
- Whether to require mandatory third-party certification of radiographers.