

NOV 5 1992

MEMORANDUM FOR: Patricia G. Norry, Director
Office of Administration

FROM: Eric S. Beckjord, Director
Office of Nuclear Regulatory Research

SUBJECT: PETITION FOR RULEMAKING (PRM 34-4) FILED BY THE
INTERNATIONAL UNION OF OPERATING ENGINEERS, LOCAL NO. 2

In accordance with your memorandum of October 26, 1992, subject as above, we have reviewed the petition and have determined that the petition does not qualify for fast track processing. Section 11.7 (d)(3) of the NRC Regulations Handbook (NUREG/BR-0053) states that if the petition has a significant economic impact on a substantial number of small entities, the NRC normally will not consider the petition eligible for "fast track" processing. Many of the companies that perform radiography work are small businesses. If they were required to use two radiography personnel on temporary jobsites, there would be a significant impact on these types of companies. In light of the above, we do not recommend the petition for "fast track" processing.

The staff has reviewed the proposed Federal Register Notice that you provided regarding the petition and concurs with its content.

The staff member assigned as the task leader for this petition is Dr. Donald O. Nellis. He can be reached at 492-3628.

ORIGINAL SIGNED BY

Eric S. Beckjord, Director
Office of Nuclear Regulatory Research

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G:GROUPS\MATE\PRM34-4

* See previous concurrences

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