



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

*Copy to Sher  
Bill Harwood*

*AE 07-1*

*PDR 025*

cc: Cool  
Nellis  
Trottier  
Thomas  
(File RM-287)<sup>dm</sup>

May 25, 1993

MEMORANDUM FOR: C. J. Heltemes, Jr.  
Deputy Director for Generic Issues  
and Rulemaking  
Office of Nuclear Regulatory Research

FROM: Frank L. Ingram  
Assistant to the Director  
Office of Public Affairs

SUBJECT: OFFICE CONCURRENCE ON PART 34 (RADIOGRAPHY)  
RULEMAKING

The Office of Public Affairs has no comments on the subject draft as transmitted by copy of your May 24 memorandum, same subject as above. However, a draft public announcement of the action is attached for inclusion with the SECY paper. If members of your staff believe that changes should be made in the draft announcement, please have them coordinate with this office before moving the paper forward.

*Frank L. Ingram*  
Frank L. Ingram  
Assistant to the Director  
Office of Public Affairs

Attachment:  
As stated

*Called Frank Ingram w/ word changes for  
public announcement.  
02 Jun 93 0940 MT.*

NRC PROPOSES AMENDMENTS TO REGULATIONS  
GOVERNING SAFETY OF RADIOGRAPHY OPERATIONS

The Nuclear Regulatory Commission is proposing to amend its regulations governing the safety of radiography operations to further enhance the safety of radiographers and the public and to provide licensees with a better understanding of what is expected in radiography operations.

Radiography involves the use of radioactive materials to produce shadow images on film. The NRC has approximately 200 radiography licensees and the 29 Agreement States (states which have assumed, by agreement, part of the NRC's regulatory authority) have an additional 500 licensees. Both NRC and Agreement State licensees often conduct business under both NRC and Agreement State jurisdiction.

The radiography regulations first were promulgated in 1965 and numerous modifications have been made since that time, the most recent in 1990 when requirements governing the performance of radiography equipment and additional reporting requirements governing equipment malfunctions were added.

As proposed, the new amendments, which have been coordinated with the Agreement States and are responsive to a 1992 petition for rulemaking from the International Union of Operating Engineers, would, among other things:

-- require that two radiographers, or a radiographer and a radiography<sup>er's</sup> assistant, be present any time radiography<sup>ic</sup> operations are conducted outside of a permanent radiography<sup>ic</sup> installation

which would provide a significant increase in assurance that operational safety measures and emergency procedures would be implemented effectively;

-- the definition of "permanent radiography<sup>ic</sup> installation" would be changed to an enclosed shielded room, cell or vault in which radiography is performed which should reduce any ambiguity as to what the term is intended to mean; in addition, a requirement for a daily check of visible and audible alarm signals would be added;

-- a requirement to provide additional training for radiography<sup>s</sup> assistants also would be added; instead of just receiving copies of the licensees' operating and emergency procedures and being tested on those documents, assistants would have to receive additional training to ensure that they are knowledgeable in regard to all pertinent NRC requirements; and

-- duties of the radiation safety officer (RSO) would have to be specified and additional training for RSOs would be required.

Written comments on the proposed amendments to Part 34 of the Commission's regulations should be received by (date). They should be addressed to the Secretary of the Commission, Nuclear Regulatory Commission, Washington, D.C. 20555, Attention; Docketing and Service Branch.