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PDR



Grinnell

CORPORATION

TECHNICAL SERVICES

1341 Elmwood Avenue
Cranston, RI 02910
(401) 941-8000

June 4, 1993

Mr. Don Nellis
United States Nuclear Regulatory Commission
Washington, DC 20555
Main Stop-NL-S-139

Re: Two Man Crew Requirements

Gentlemen,

After a review of recent NMSS license newsletters and NRC bulletins, our concerns for a mandatory two man crew requirement has escalated. We feel that violations found could be eliminated if two technicians were on a project.

Our major concern is controlling and surveying the restricted area. Through past experiences, we have found it is virtually impossible to survey the restricted area and have complete control and vision of the source utilizing one man. Since the radiographic testing business is very competitive, we have lost numerous projects to other companies who are utilizing one technician.

As we all realize, in certain field projects such as pipelines and power plants, it is virtually impossible to abide by NRC regulations utilizing one radiographer.

Through our past experiences with your office, and our on-going Radiation Safety Program, we feel that Grinnell Corporation has set an example for other companies as a safety oriented organization.

Enclosed is a copy of a speech presented at ASNT's 1993 Spring Conference in Nashville, TN on April 2, 1993.

This effort by Grinnell is our on-going commitment to radiation safety, IRRSP and a mandatory two man crew requirement.

We feel that the companies that are operating with one technician in order to be competitive, are a definite radiation safety problem in the industry.

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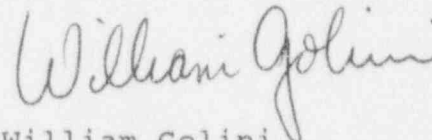
At your convenience, we would appreciate a meeting with yourself and your staff to discuss this apparent problem. We are willing to travel to your office anytime in the near future.

We hope to hear from you on this matter in the near future.

Thank you for your time and consideration regarding the enclosed.

Very truly yours,

GRINNELL CORPORATION



William Golini
Radiation Safety Officer

WG:dad

Enclosure

cc: G. T. Mulvaney
Mary Thomas/NRC Washington
Charles McMann/State of R.I., 206 Cannon Bldg.,
75 Davis St., Providence, RI 02908