

AE07-1039

PDR



**Grinnell**

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USNRC

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TECHNICAL SERVICES

October 19, 1993

United States Nuclear Regulating Commission  
Secretary  
Washington, DC 20555

Attn: Docketing and Service Branch

RE: Proposed changes to 10CFR Part 34

Gentlemen,

After a in depth review of the proposal changes to 10CFR Part 34 we have listed below the comments:

- Section 34.1           • No comment, in agreement.
- Section 34.3           • We are in agreement with the proposed changes. Since definitions of terms are not listed in the current 10CFR Part 34, the additions will answer numerous questions of those who are not familiar with these terms and definitions.
- Section 34.5           • We feel that the general counsel's authority to provide interpretations could be a bias decision. Input from organizations involved in the industry could be a advantage in these decision making process.
- Section 34.8           • No comment, in agreement.
- Section 34.11          • No comment, in agreement.

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- Section 34.13 (c) • We are in agreement with establishing procedures for verifying certification status of radiographers.
- Reducing the frequency of field audits from quarterly to annually is basically a cost saving reduction. At present the NRC does not know how often a licensee is performing a audit until a audit is performed by them. Reducing the audit frequency will work only if the NRC performs their audits and has a periodic audit check system in place. Our organization will continue to perform quarterly audits as a safety check and a enhancement to our Radiation Safety Program.
- Section 34.13(d) (b) • We are not in agreement with changing the clarification of training to read annual instead of periodic. Our organization performs periodic training during the year and when changes in equipment, regulations and procedures occur. By changing the requirements to annual, organizations might perform training at the end of the year to satisfy the requirement, overlooking important changes that occur during the year.
- Section 34.12 (g) • We agree with the proposed rule to designate a individual in the licensee as the R.S.O. and incorporate his/or her qualifications.
- Section 34.13 (i) • No comment, in agreement.
- Section 34.20 (b) (2) • No comment, in agreement.
- Section 34.20 (b) (3) • We totally agree with the proposed modifications for individuals not to modify safety requirements of any exposure device.
- Section 34.20 (c) • By adding the term source assembly it clarifys that it is a crucial piece of equipment that must meet all requirements of 34.20.

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- Section 34.20 (f) • Labeling equipment, acquired after 1/10/96 is a good suggestion, but more detail must be added as to what type of labeling will be required.
- Section 34.21 • The addition of metric equivalents to radiation value levels would confuse most organizations. Until we convert to a metric system this proposed change would only confuse the system.
- Section 34.23 (a) • We agree with the proposed change to remove the key from any key locked exposure device. By leaving the key in the device, a organization is apt to have a incident, which would be adverted. Currently in our organization all radiographers have been trained to remove the key from each exposure device at all times.
- Section 34.23 (b) • By adding the requirement of ensuring the source is secured in the shielded position before moving will reduce overexposure and incidents in the future.
- Section 34.25 • Calibrations of survey meters should be unchanged. A standard calibration system should accommodate all types of survey meters currently in use.
- A operability check proposal is a operation that should be performed at all times. A mandatory revision including this requirement would reduce overexposures and incidents in the industry.
- Section 34.27 • No comment, in agreement.
- Section 34.27 (f) • The requirements of survey for contamination of the "S" tube should have been incorporated in 10-CFR Part 34 years ago. The "S" tube is a crucial piece of equipment and if worn, retraction of the source could be a major problem that could lead to unwarranted exposures and incidents.

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- Section 34.29           • No comment, in agreement.
- Section 34.31 (a)(b)• Inspection & maintenance is a important function in a radiography operation. If defective equipment is not sent to the Mfg. for repair or replacement, a major overexposure or incident could occur. We feel normal quarterly maintenance can be performed in house if documented correctly. A revision to clarify how defective equipment should be handled is apparent and needed.
- Section 34.33 (a)(b)• No comment, in agreement.
- Section 34.35           • The proposed requirement of labeling and security precautions for radioactive material storage would benefit all involved. By having correct labeling identified and correct storage provisions, the danger from fire or explosions would minimize a individual or individuals from a overexposure.
- The proposed changes would also alert the public as to what they are dealing with in the case of an emergency.
- Section 34.41           • We totally agree with the proposed rule to have mandatory either two radiographers or a individual who has met requirements to be a radiographer's assistant present anytime radiography would take place outside of a permanent installation.
- Currently Grinnell Corporation operates at all field site locations utilizing a two person crew. One individual is required to be a radiographer, and the other could be an assistant radiographer or trainee. All trainees at Grinnell Corporation had 40 hour of radiation safety training prior to being placed in any field operation and require 240 hours of on-the-job training before qualifications to become an assistant radiographer.

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- Section 34.33           • No comment, in agreement.
- Section 34.41 (b)       • See comments listed in 34.41.
- Section 34.42           • Listing the qualifications of the R.S.O. should have been added in the past to Part 34.
- A forty hour class for the R.S.O. with respect to establishment and maintenance of radiation safety programs will enhance a organization. This would weed-out unqualified individuals presently operating or assigned as R.S.O. to organizations.
- We must keep in mind the direct responsibility of the safety program and the safety of employees and the general public is the sole responsibility of the R.S.O. Currently the system in place does not verify the qualifications of a R.S.O.
- Section 34.43 (a)       • The revision to have radiographers certified by a certifying agency should have been implemented years ago. This is the only system where a verification of training and experience can be verified.
- We feel licensees would implement the requirement in one year vs. two years as stated in the proposed rule.
- Currently all full-time radiographers at Grinnell Corporation are qualified and certified as industrial radiographers for gamma and x-ray through ASNT, IRRSP program.
- We were one of the first organizations to make the commitment to pursue this certification.

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- Section 34.43 (b) • Addition of training requirements for radiographers and assistants to incorporate DOT regulations will enhance every organizations knowledge of the correct DOT requirements and should be included in the amendment.
- Section 34.43 (b)(3) • We are in agreement to give a written test vs. a oral test to the above listed requirements. Through past experiences a oral test holds no certification that an individual understand the requirements.
- Section 34.43 (c) • See comments listed in 34.13 (d)(b) in text.
- Section 34.43 (d) • See comments listed 34.13 (c) listed in text.
- Section 34.43 (e) • No comment, in agreement.
- Section 34.43 (f) • Pictures of source assemblies will enhance a individual insight as to what a actual source assembly looks like.
- Training in storage, disposal and control of licensed material should be added in the proposed rule.
- Section 34.43 (g) • Licensees that are not certified to a certifying program should qualify within one year not the two year requirement. Through experience at Grinnell, all of our full time radiographers have certified to the ASNT, IRRSP certification program. This was accomplished well within a one year time frame. The two year proposal would only let uncertified individuals act as radiographers, which could lead to overexposures and increased incidents.
- Section 34.45 • We feel that no organization should be allowed to retrieve a source, unless they have submitted a extensive emergency and training procedure to the NRC. Upon review by the NRC, a decision would be made as to certify the agency or not to retrieve sources in emergency situations.

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- Section 34.45 (b) • No comment, in agreement.
- Section 34.46 • No comment, in agreement.
- Section 34.47 • We feel monthly replacement of film badges should be mandatory. This system will enable licensees to track exposures more frequently for individuals employed and individuals who leave the organization and require prior dose records.
- Section 34.47 (b) • The proposed revision to read dosimeters at the beginning and the end of each shift should be mandatory. By performing this task radiographers can keep a more current evaluation of exposures received.
- Section 34.47 (d) • We agree with the proposed rule for the R.S.O. to make a determination of a off scale dosimeter. If a situation is justified as a non exposure incident by the R.S.O., the individual should be able to resume his or hers assignment.
- Section 34.47 (g) • Rate meters should be supplied with a vibrating or ear connection, so that the radiographer can hear the alarm. In higher noise area situations it is almost impossible to hear a rate meter alarm.
- Sections 34.49 • We are in agreement to delete the survey of the circumference of the exposure devise and guide tube and to replace the requirements with a survey as he/she approaches the exposure devise and guide tube. When approaching a exposure device after an exposure, a radiographer should be aware of their survey meter reading, then lock the camera, and then perform the required surveys.
  - On most exposure devices, the connector ring can not be moved to the locked position if the source is not secured.
- Section 34.51 • No comment, in agreement.

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- Section 34.61 • No comment, in agreement.
- Section 34.63 • No comment, in agreement.
- Section 34.65 • No comment, in agreement.
- Section 34.67 • No comment, in agreement.
- Section 34.69 • No comment, in agreement
- Section 34.71 • The proposed rule to add the serial number of the device in the utilization log should help track where sources have been used and what projects they were used on.  
• The requirement for the dates the device is removed and returned to storage will also help track location and the hours the source was actually out of the facility.
- Section 34.73 • No comment, in agreement.
- Section 34.75 • No comment, in agreement.
- Section 34.79 • Maintaining records of radiographer certifications and training is a vital link in a safety program. By accurate record keeping a data base of important information can be compiled.
- Section 34.81 • No comment, in agreement.
- Section 34.83 • No comment, in agreement.
- Section 34.85 • No comment, in agreement.
- Section 34.87 • No comment, in agreement.
- Section 34.89 • We agree that all pertinent required records be available at field site operations. This would eliminate any questions regarding the radiation safety program and how it is implemented.
- Section 34.91 • No comment, in agreement.



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Section 34.101 (c) • No comment, in agreement.

Subpart F

Subpart G • No comment, in agreement.

Subpart H • No comment, in agreement.

Appendix A • We are in total agreement with this proposed change. A strict format should be followed and approved by the NRC for all agencies applying to be certifying agencies.

- A guide for all applying agencies should be the ASNT, IRRSP program.

#### AGREEMENT STATE COMPATIBILITY

We believe that certification programs for radiographers must be the same for all NRC and agreement states. This is the only system available to maintain consistency among both and the industry. The problem we foresee is the lacking of adopting rules by agreement states. Some past instances have shown agreement states to adopt a NRC change years after the dated change.

A formal commitment and time frame should be considered for all agreement states.

#### IMPLEMENTATION

- A 90 day effective date on proposed requirements is a reasonable time frame except as listed below:
- Radiographer certification should be one year instead of the proposed two year deadline.
- Additional training requirements should be completed in a timely manner in the one year time frame.
- The one year time frame for the rate meter revisions is reasonable.
- Additional R.S.O. training proposed should be completed in one year not the two year as proposed.

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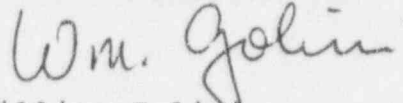
The commission should address all hardships from organization separately and individually. Many organizations may have similar hardships, but the source and correction may differ significantly.

We sincerely hope that the commission will seriously take into consideration our comments on the proposed changes.

If there is anything that your office requires from us please call us at (401) 941-8000.

Very truly yours,

GRINNELL CORPORATION



William Golini

Radiation Safety Officer

WG\jts

cc: George T. Mulvaney  
John Perry  
Robert Taylor  
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