



DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND  
200 STOVALL STREET  
ALEXANDRIA, VA 22332

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OFFICE OF SECRETARY  
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Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

DOCKET NUMBER  
PROPOSED RULE **PR-34**

(47 FR 19152)

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Gentlemen:

The advance notice of proposed rulemaking to amend 10 CFR 34 to provide for third-party certification of industrial radiographers has been reviewed. Response to the specific questions in the advance notice is given in the enclosure.

In general, if third-party certification means certification only by a party outside the Navy, then the Navy is opposed to this plan. If third-party certification permits certification by a Navy party independent of the users, then the Navy is not opposed to third-party certification.

Sincerely,

*Gene Hendrix*

GENE W. HENDRIX  
Program Manager  
Radiological Affairs  
Support Program

Encl:

- (1) Navy comments on the Desirability of Establishing a Third-Party Certification Program for Radiographers

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*DSIO  
add: James Town  
5650 NL*

Acknowledged by card 11/30/82 emg

NAVY COMMENTS ON THE DESIRABILITY OF ESTABLISHING A  
THIRD PARTY CERTIFICATION PROGRAM FOR RADIOGRAPHERS

1. Is the training provided to radiographers under the present system adequate?

The present training system for Navy radiographers is considered adequate.

2. Would a third-party certification program reduce the number of overexposures in the radiography industry?

Third party certification would not significantly reduce the number of overexposures in the radiography industry except in cases where radiographers were ignorant of basic requirements. Most overexposures are caused by inattention to and noncompliance with basic requirements, particularly failure to conduct required surveys. Experienced radiographers have been mostly involved in overexposures.

3. Would a third-party certification program motivate radiographers to work more safely?

Third party certification would assist the radiographers who have weak training. The implication is that the threat of revocation will motivate the radiographers. This is not considered effective. Motivation must be provided by licensee management commitment and initiative. More effective results would be achieved by better training programs and enforcement activities.

4. What elements in the present system or in the suggested alternative are particularly desirable or undesirable? Why?

The present system of training permits maximum flexibility in scheduling and is considered adequate. However, it is difficult to monitor and to ensure a minimum basic knowledge level industry wide.

The third party certification has a desirable goal; i.e., a minimum basic knowledge level. However, the undesirable aspects are:

- (1) Increase costs.
- (2) A limit to depth of training due to variety of equipment.
- (3) Reduced flexibility in scheduling.
- (4) Difficulty for the certifier to develop an adequate exam based on the local facility.

5. If a third-party certification program is adopted, what items should be included in the standard for determining the competence of individuals to act as radiographers?

Items that should be included in a standard of competence are:

- (1) Biological effects and hazards of radiation.
- (2) Radiation surveys and personnel monitoring.
- (3) Local operating and emergency procedures.
- (4) Practical exercises involving several exposures.
- (5) Simulated hung source drills.
- (6) On-the-job training.

6. If a third-party certification program is adopted, should it apply to individuals presently working as radiographers or only to new radiographers?

The third party program should apply to all radiographers.

7. If a third-party certification program is adopted, should certificates be issued to individuals for life or should there be periodic renewals of the certification?

Certification should be renewed periodically. Three to five year intervals were suggested.

8. Would a third-party certification program affect the ability of a licensee to respond to variable manpower needs?

Yes.

9. Since a third-party certification program would likely be based on cost recovery by a fee system, would the cost to the licensees of such a program be warranted?

This depends on how the program is defined and implemented. Small radiography programs would receive more benefit from the program than large radiography programs.

10. Which alternatives of the two discussed (present system, third-party certification) is preferable? Why? Are there other better alternatives? If so, please explain.

The present system is favored. Most Navy licensees have an internal organization which is similar to a third party certification. The Service School Command Non-Destructive Testing School in San Diego is a third-party certifier for the Navy.

Most licensees interpreted the NRC certification program to require third-party training which is not considered cost effective in addition to current training. Third-party certification with the licensee conducting the training was not considered practical.

11. With respect to the two alternatives, what kind of enforcement action could and should be taken against radiographers who do not operate equipment safely or follow established procedures? What rights should radiographers have with respect to such enforcement actions?

Local management should have flexibility in determining enforcement penalties.

12. Would a small licensee, because of its size, bear a disproportionate adverse economic impact under a third-party system?

Yes, unless the fee could be based on the number of radiographers certified. Travel costs would be the same for both large and small groups of radiographers (the certifier travels to the facility).

13. For those organizations that are interested in participating in a third-party certification program, what would be the estimated cost in implementing such a program?

No comment. This cannot be estimated until a program is defined.