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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DOCKET NUMBER
PETITION RULE PRM -34-3
(47 FR 52722)

September 27, 1982

Secretary, U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: CHIEF, DOCKETING & SERVICE BRANCH

RE: Petition For Rule Change Title 10 CFR, Part 34, 34.43(c)

34.43(c) Regulation is printed as follows:

A record of the survey required in paragraph (b) shall be maintained for two years when the survey is the last survey prior to locking the radiographic exposure device and ending direct surveillance of the operation.

Petition requests that 34.43(c) be printed as follows:

A survey with a radiation survey instrument shall be made at a point on the surface of the radiographic exposure device, specified by the licensee, at or within the storage area when storing. This survey shall be recorded and maintained for two years from the date of survey.

The basic reason we request this petition is to have a recorded survey that can be useful in determining that the radiographic exposure device has been stored with the sealed source in its safe location in the exposure device.

The title of Paragraph 34.43 is, "Radiation Surveys" and (b) covers a survey of the exposure device after each exposure period. As required now the reading recorded could be anywhere from 0 MR to 200 MR and it could not be said that the radiographer had made a correct survey. Our petition includes a specified point on the exposure device. This record then becomes meaningful since you have a check on the decay of the sealed source and that the survey instrument is working correctly. It would reveal that the radiographer is following instructions and training. We believe that a survey of the device at the time of storage is essential to safe operation. Since this is not required as paragraphs (b) and (c) are presently written and interpreted, it is essential that paragraph (c) be changed to cover the last survey, at the end of use, at the time of storage. In many cases the exposure device is subject to rough handling in transferring it to the storage area from a work area, such as lowering via cranes, cherry pickers, or hoists.

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Page 2

There have been several cases when the sealed source was in the radiographic exposure device after the final exposure but was outside of the exposure device when stored. A record survey at the time of storage would have indicated that the sealed source had been dislodged and by back tracking with a survey instrument the sealed source could have been located and retrieved with a minimum exposure. (Radiation Safety)

The radiographers must be instructed and trained that their responsibilities have not been completed until the sealed source has been safely stored and the paper work completed.

A lot of radiography is performed on an off-shift for radiation safety. (Alara) Therefore, it is hard to conceive that a radiographer would stop in a rain storm, freezing temperatures, or high in the air with high wind and search for a form and pencil to record the reading.

CBI has been licensed by the NRC since 1968 and has had as many as 100 exposure devices in operation at one time in various parts of the world.

Rex E. Vincent

Rex. E. Vincent
Radiation Protection Officer
CHICAGO BRIDGE & IRON COMPANY

REV/sah