



1005 North Knight Street
Plant City, Florida 33566

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DOCKET NUMBER PR-34
PROPOSED RULE (47 FR 19152)

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

Attention: Docketing and Service Branch

Gentlemen:

Please consider the following comments and suggestions regarding the proposed rulemaking of methods involved in training and designating individuals as radiographers. As a person with nineteen (19) years experience, both as a radiographic technician and one responsible for the training and examining of radiographic technicians, I cannot agree with the Nondestructive Testing Management Association (NDTMA) thinking that third-party certification would serve any useful purpose.

Under the present system of training for radiographers, the Nuclear Regulatory Commission and/or Agreement State Commissions require applicants for licenses to use, handle, or store radioactive isotopes to submit certain assurances of their capabilities to do such safely. The application for such a license must be accompanied by an operating and emergency procedure, a detailed training program, a satisfactory storing procedure and much information to prove the integrity of company officials and their desire to insure the safety of both the radiographer and the general public. Applications for licenses, and all accompanying procedures, programs, and general data are carefully scrutinized by the Nuclear Regulatory Commission or the Agreement State Commission before license approval is granted. When such approval appears probable, a visit is then paid to the facility by an inspector from either the Nuclear Regulatory Commission or Agreement State. All detail in the application, procedures, programs, and general data are carefully checked and only after meeting this rigid inspection is a license granted. I see no area where the entrance of a third-party would be of advantage.

With all of the above precautions taken by the Nuclear Regulatory Commission or Agreement State Commission, the present system of training certainly must be considered adequate. Examination questions for the radiographer is submitted at the time of license application, and the examination questions and their answers are made part of the radiographers premanent file that is always available to audit teams at times of their annual visits.

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James Jones
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