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PROPOSED RULE PR 34-150
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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

June 1, 1994

Secretary
U S Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing & Service Branch

Subject: Proposed Revisions to CFR 10, Part 34

Dear Sir or Madam,

I am employed by a radiography licensee and hold both an ASNT and Texas State IRRSP certification. Please accept this response, although two days past the deadline. I shall address the proposed revisions item by item.

ITEM #1 - Subpart C - Equipment

34.20 Performance requirements for radiographic equipment

- (b)(1) Each exposure device must have attached to it by the user, a durable, legible, clearly visible label bearing the ———
- (ii) Activity and date on which the activity was last measured
- (v) Licensee's name, address and telephone number
- (c)(9) Source changers must provide a system for ensuring the source will not be accidentally withdrawn from the changer when connecting or disconnecting the drive cable to or from a source assembly.

RESPONSE #1

An individual source tag and decay chart is already provided by the manufacturer. The tag is affixed to the exposure device and contains the encapsulation date and curie strength. The decay chart lists the same date and wipe test results. This requirement is redundant and unnecessary. **I oppose it.**

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ITEM #2

34.23 Locking and relocation of radiographic exposure devices, storage containers...

- (b) Radiographic exposure devices, source changers, and storage containers, before being moved from one location to another, must have guide tubes and control cables disconnected, safety plugs or covers applied, locked and physically secured to prevent accidental loss, tampering or removal.

RESPONSE #2

The term "from one location to another" is ambiguous and needs clarification.

Removing the guide and installing the front safety plug will prevent any accidental movement of the source assembly out of the fully shielded position. I support this portion.

Removing the control assembly and installing the rear safety cap would not increase the safety factor because the source cannot be removed from the rear. Individuals would receive more radiation exposure to extremities because of repeated connections and disconnections. The introduction of contaminants to the drive cable or guide tube would drastically increase causing excessive and premature wear of the 'S' tube and lock assembly, and possible contamination from DU. **I oppose this portion.**

ITEM #3

34.25 Radiation Survey Instruments

- (b) Licensee shall have radiation survey instruments calibrated ———
(1) at intervals not to exceed 6 months

RESPONSE #3

Maintaining accuracy over a six month interval during continued radiography operations is extremely suspect and a survey instrument is absolutely the most important tool to prevent an over exposure.
I oppose it.

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ITEM #4

34.27 Leak testing and replacement of sealed sources

- (f) Each exposure device using depleted uranium (DU) shielding and an 'S' tube configuration must be periodically tested for DU contamination. This test must be undertaken at intervals not to exceed 12 months...

RESPONSE #4

This will prevent individuals from being contaminated by DU and older exposure device will be checked more thoroughly and removed from service as needed. **I support it.**

ITEM #5

34.41 Conducting radiographic operations

- (a) Whenever radiography is performed at a location other than a permanent radiographic installation, the radiographer must be accompanied by at least one other qualified radiographer or an individual who has at a minimum met the requirements of 34.43(b).

RESPONSE #5

A second qualified individual will be available in case of an emergency situation and would prevent an untrained or unsuspecting individual from receiving an unintentional over-exposure if the radiographer in charge were incapacitated. It also provides for superior area surveillance and control, a slower paced environment for on-the-job training of new employees and it divides up the person-rem exposure. **I support it.**

ITEM #6

34.42 Radiation Safety Officer

- (a) The RSO's qualification must include
- (1) Completion of the training and testing requirements of 34.43(a) and;
 - (2) 2000 hrs experience in industrial radiographic operations, with at least 40 hrs formal classroom training with respect to the establishment and maintenance of a radiation safety program.

RESPONSE #6

This provides for a better qualified RSO and it would be difficult to appoint a unqualified individual. **I support it.**

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ITEM #7

34.43 Training

- (a) The licensee may not permit any individual to act as a radiographer until the individual—
- (2) Is certified through a radiographer certification program by a certifying entity in accordance with the criteria specified in Appendix A
- (d) The licensee shall conduct an annual inspection program of the job performance of each radiographer and radiographer's assistant to assure compliance.
- (g) The licensee may, until ..., allow an individual who has not met the certification requirements ..., to act as a radiographer after the individual has received training in the subjects outlined in paragraph (f) of this section and demonstrated understanding of those subjects by successful completion of a written examination that was previously submitted to the Commission.

RESPONSE #7

This would weed-out unqualified and unsafe radiographers. On the condition the NRC provides for and maintains authority to revoke an individual's certification for just cause, I support it.

One year field evaluations would mean less oversight and increased possibility of undetected violations due to the extended time between the evaluations. **I oppose this portion.**

ITEM #8

34.47 Personnel monitoring

- (d) If an individual's pocket dosimeter is found to be off-scale and the possibility of radiation exposure cannot be ruled out as the cause, the individual's film badge or TLD must be sent immediately for processing. In addition, the individual may not work with licensed material until a determination of the individual's radiation exposure has been made.
- (g) Each alarm ratemeter must
- (3) Be adequate to alert the individual regardless of the environmental conditions...

RESPONSE #8

This determination could prevent adding to an over exposure. **I support this portion.**

This equipment requirement would enable an individual to be alerted to an alarming ratemeter under all conditions only if it is properly maintained and utilized. You cannot prevent a licensee or individual from engaging in unsafe and wilful misconduct by regulation alone. The additional equipment cost will not increase safe practices and I am concerned as to when and where the addition of upgrades will end. **I reluctantly support this portion.**

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ITEM #9

34.49 Radiation surveys

The licensee shall:

- (b) Conduct an adequate survey of the radiographic exposure device with a radiation survey instrument after each exposure to determine the sealed source has been returned to its shielded position.
- (c) Conduct a survey when approaching the guide tube before exchanging films, repositioning the collimator, or dismantling equipment.

RESPONSE #9

This provides for a reasonable survey without endangering an individual. **I support it.**

Thank you for the opportunity to express my opinion on these important regulatory changes.



Bruce R. Ballard