

17



DOCKETED  
USNRC

'94 MAY 23 P4:27

DOCKET NUMBER  
PROPOSED RULE PR342150  
(59FR 9429)

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

May 17, 1994

Secretary  
US Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Docketing and Service Branch  
Subject: Comments on 10CFR Part 34 proposed rule making

Gentlemen,

Please take the time to review the comments listed below concerning the proposed 10CFR part 34 changes. It is important that the commission consider every citizens comments when making changes as far reaching as those proposed.

Clarification is needed in paragraph 34.3 definitions. It is unclear what is meant by a temporary job site. Since the term temporary job site is used when defining a permanent radiographic installation it becomes critical that there is a clear understanding of what is meant when referring to a temporary job site. If this clarification is not made the terms field station and temporary job site can be confused and ultimately take on the same meaning.

Paragraphs 34.14 (e) and 34.43 (d) of the proposal appear to reduce the frequency of radiographer inspections. This does not seem supportive of the commissions statistics that indicate that the majority of increased exposures are a result of the radiographers failure to perform proper surveys. An annual time frame is too long of a time period to let pass between evaluating performance issues. It seems that more emphasis should be placed on increasing the quality of evaluations not reducing there frequency. If the intent is to reduce costs then it would seem to be more appropriate to remove the requirement to inspect a radiographer assistant than to reduce audit frequency on a radiographer. Since an assistant cannot perform radiography without the direct supervision of a radiographer than in reality every radiographic effort is being inspected. This is a cost that is being mandated without cause.

Paragraph 34.20 (b) (i) requires that each exposure device have attached by the user a label bearing information. It would seem that if the user mandates that the supplier attach this label the actual need would be better served. The supplier would have the means in which to attach labeled information in such a manner so that it is of a more permanent nature and reducing improperly identified devices. This would not eliminate the responsibility of the user to verify its presence or accuracy.

Paragraph 34.20 (b) (3) allows no modifications whether safety related or not. It is important that the word modification is clearly defined. It would seem that it would not be the proposals attempt to not allow the user to perform non-safety related modifications to increase productivity or labeling.

Paragraph 34.27 (f) would be more meaningful if it included a provision to exclude the testing for depleted uranium contamination if the device is in storage and has not been used during the time frame from the last required testing.

DS10

Paragraph 34.41 conducting radiographic operations advocates the use of two person radiographic teams. This is a regulation that is long overdue. While the increased cost is minimal the enhancement of safety is maximized. When operating a single person radiographic operation under field conditions one must question what potential damage could occur if that radiographer should become incapacitated.

Please consider these comments in the spirit in which they are given to enhance the safety of radiographic operations without creating unnecessary burdens on an important part of American business.

Very truly yours,  
MQS Inspection, Inc.

A handwritten signature in black ink, appearing to read "Rod Reinholdt", written in a cursive style.

Rod Reinholdt  
Vice President Laboratory Operations

cc: Hugh Doran