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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DOCKET NUMBER
PROPOSED RULE PR 34 & 150
(59 FR 9429)

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May 27, 1994

Secretary --
U.S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, DC 20555

Re: Comments to NRC Proposed Rule
10 CFR Parts 34 and 150
RIN 3150-AE07

Dear Sir/Madam:

The following comments are in response to the NRC proposed rule change as referenced above:

Comment #1 (Two qualified individuals to be present at temporary jobsite)

The number of personnel assigned to each job site should be left up to the licensee. There are times when two or more personnel would be required, but there are also times when only one qualified radiographer is sufficient due to very low production.

It is difficult to justify the cost and pass it on to the customer for two qualified radiographic personnel when one radiographer can do the job and meet all the regulations.

I have had negative response from some of our customers opposing the two radiographic personnel due to the extra cost, again it should be left up to the licensee to select the number of radiographic personnel that will make the job a safe work place.

As far as safety is concerned, I prefer one radiographer to have the responsibility versus sharing the responsibility between two radiographic personnel.

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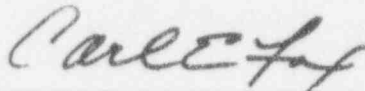
Comment #2 (Mandatory certification of radiographers)

I prefer to leave the certification of radiographers voluntary for third-party. The licensee should have the option to train and certify radiographic personnel under their own approved training program or opt to send them to a third party. The licensee is responsible for the training and certification of radiographers.

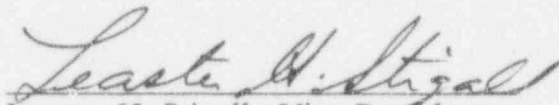
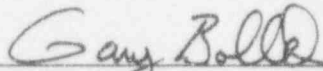
The cost of third-party certification would place a burden on most small entities, therefore should be left voluntary.

Thank you for your consideration as you review these comments.

Sincerely,
INTERMOUNTAIN TESTING COMPANY



Carl E. Fox, President


Leaster H. Stigall, Vice-President

Gary Bolletud, Operations Manager