

DOCKET NUMBER
PROPOSED RULE **PR 34 2150**
(59FR 9429)

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24

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 —

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(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Source changers must provide a system for ensuring that the source will not be accidentally withdrawn from the changer when connecting or disconnecting the drive cable to or from a source assembly

COMMENTS:

PRO THIS COULD PREVENT ACCIDENTAL EXPOSURE

~~CON~~

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 the guide tubes and control cables disconnected, safety plugs or covers applied, locked and physically secured to prevent accidental loss, tampering or removal.

COMMENTS:

~~PRO~~

CON WHILE USING A RADIOGRAPHIC EXPOSURE DEVICE IN A DUSTY AND DIRTY OR SWAMPY AREA, I BELIEVE DISCONNECTING & CONNECTING THE SOURCE EACH TIME WHILE MOVING FROM WELD TO WELD COULD BE MORE HARMFUL. THIS COULD ALLOW DIRT TO GET IN DRIVE CABLE OR CAMERA & PREVENT SOURCE FROM MOVING FREELY AND RETURNING TO SHIELDED POSITION.

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34.25 Radiation Survey Instruments

(b)

Licensee shall have radiation survey instruments calibrated —

(1) at intervals not to exceed 6 months

COMMENTS:

PRO THIS WOULD BE A COST REDUCTION FOR THE X-RAY COMPANY

~~CON~~

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...

COMMENTS:

PRO THIS WOULD BE A SAVING'S TO X-RAY COMPANY

~~CON~~

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).

(these requirements are for a radiographer's assistant)

COMMENTS:

PRO THIS IS A GOOD WAY TO TRAIN MORE RADIOGRAPHERS &
~~CON~~ ALSO HELPFUL IN PROTECTING RADIATION AREA IN
CASE OF AN EMERGENCY TO RADIOGRAPHER

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;
(these requirements are for a radiographer)
- (2) 2000 hours of documented experience in industrial radiographic operations, with at least 40 hours formal classroom training with respect to the establishment and maintenance of a radiation safety program.

COMMENTS:

PRO A RADIATION SAFETY OFFICER SHOULD BE WELL TRAINED
~~CON~~ & EXPERIENCED.

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
(a radiography licensee would not meet this criteria)
- (c) The licensee shall provide annual safety reviews for radiographers and radiographer's assistants at least once during each calendar year.
- (d) The licensee shall conduct an annual inspection program of the job performance of each radiographer and radiographer's assistant to compliance
- (g) The licensee may, until (Insert date 2 years after the final rule is published in the Federal Register), allow an individual who has not met the certification requirements of paragraph (2)(a) of this section 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.

COMMENTS:

PRO THIS WILL BE FINE AS LONG AS THERE IS A SUFFICIENT
~~CON~~ AMOUNT OF TESTING DATES.

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 (e.g., high ambient noise levels).

COMMENTS:

PRO

CON THE RADIOGRAPHER SHOULD USE SURVEY METER AT ALL TIMES. THIS WAY HIGH NOISE LEVELS SHOULD NOT INTERFERE

34.49 Radiation surveys

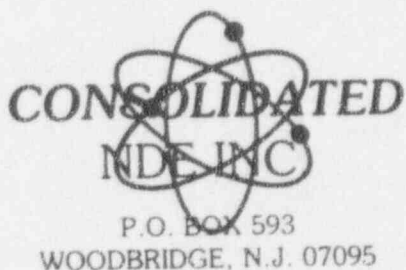
The licensee shall:

- (b) Conduct an adequate survey of the radiographic exposure device with a radiation survey instrument after each exposure to determine that 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.

COMMENTS:

PRO THIS SHOULD ALWAYS BE DONE

CON



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