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modern transportation company, inc.

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May 5, 1994 OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: 10 CFR Part 34
RIN 3150-AE07

Dear Secretary:

After reviewing the proposed change in the rule requiring two personnel for radiographic operations, I would like to file the following comments:

As a manufacturer, safety to our personnel or subcontractors is one of our priorities. When we subcontract for the use of a radioisotope, we expect the radiographer to follow our safety procedures as well as theirs.

We have contracted one-person radiographic work for the past ten years without any safety problems.

This higher radiographic cost will be passed on to the manufacturer. In today's market this will cause us to become non-competitive due to higher costs.

It is my opinion that the safety officer at the lab should be responsible for determining if two radiographers are required. If the safety officer is satisfied that our personnel can work with his radiographer in a safe manner, then we can subcontract one radiographer.

Respectfully,
Modern Welding Company

Phil Grimm, Manager
Corporate Quality Assurance

CORPORATE OFFICE Owensboro, Kentucky (502) 685-4400

SUBSIDIARIES:

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