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Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Attn: Docketing and Service Branch

Subject: Comment to Proposed Rule 10 CFR Part 34 dated February 28, 1994

Gentlemen:

This is to support the proposed rule 10 CFR Part 34 dated February 28, 1994. Specific support rationale is listed for the following items:

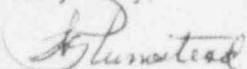
(1) Two qualified individuals to be present whenever radiography occurs at temporary jobsites. This requirement is necessary to improve radiation safety to the radiographer and the public. Temporary jobsites may involve obstacles that prevent a single individual from maintaining visual surveillance of the restricted area during radiographic exposures. At least two individuals permit posting positions that will provide greater assurance of maintaining adequate visual surveillance during radiographic exposures. A second qualified individual offers a safety backup in the event that a radiographer is injured or otherwise incapacitated during radiographic operations.

(2) Mandatory certification of radiographers. Third party certification of radiographers will increase the overall knowledge of radiographers resulting in an improvement in safety awareness. Training emphasis will increase to assure that individuals pass an examination required to work with radioactive isotopes. Third party certification will reduce personnel qualification leniency sometimes associated with employer work schedules and business pressures. Radiographer safety performance will improve to reduce the risk associated with the suspension or loss of "certification".

(3) Radiation Safety Officer qualification and training requirements will assure a standard of qualification that is appropriate to the responsibilities of the position. The requirement for two years of experience as a radiographer provides knowledge of the variables associated with radiographic operations. This experience permits personnel training that may prevent radiation incidents and poor workmanship practices. Required training in program administration will assure that employers provide adequate preparation of RSO's to perform their responsibilities. Formal training reduces the errors associated with only on-the-job development of RSO's.

I am confident that these proposed rules changes to 10 CFR 34 will result in a significant overall improvement in industrial radiography safety. These rules changes should increase the level of consistent, safe radiation practices in industrial radiographic operations

Very Truly,



William C. Plumstead

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