

Tenneco Gas

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Secretary, U.S. Nuclear Regulatory Commission  
Attention: Docketing and Service Branch  
Washington, D.C. 20555

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Mr. Secretary

These comments are regarding your proposed rule changes, Federal Register, Volume 59, No. 39, dated Monday, February 28, 1994.

The purposed rule changes include requirements specifying the qualifications and duties of the Radiation Safety Officer. Section 34.42 (2), states the requirement of 2000 hours of documented experience in industrial radiography with at least 40 hours of formal classroom training with respect to the establishment and maintenance of radiation protection programs. Section 34.42 (2) also stated, it is anticipated that most existing RSO's already meet these requirements. There needs to be additional specifications to clarify the documentation requirements for the 2000 hours of documented experience (e.g. experience as a radiographer, RSO, and any grandfather clauses if applicable). To have the documentation for 2000 hours of experience may be a problem. It's my belief that most documentation needed to meet this requirement will have been destroyed because of the short record keeping retention time and that most RSO's have not been functioning as a radiographer for several years. Also the 40 hours of formal classroom training contents with respect to the establishment and maintenance of radiation protection program have not been clearly specified as with the radiographer training programs. Also, must the training facility/program be a NRC approved entity/program as you require for the radiographer training and certifying programs?

David L. Culbertson  
Radiation Safety Officer

DLC/jdf/QA940013

cc: S. R. March  
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