

EMPIRE STEEL CASTINGS, INC.

DOCKETED
USNRC

18

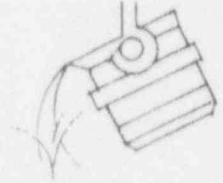
ESC

STAINLESS • ALLOY • CARBON
STEEL CASTINGS

P.O. Box 139 • Reading, Pa. 19603-0139
Telephone 215 921-8101
FAX 215 921-9838

'94 MAY 23 P4:26

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH



Docketing and Service Branch
Secretary U.S. Nuclear Regulatory Commission
Washington DC 20555

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

Dear Secretary U.S. Nuclear Regulatory Commission;
Comments proposed Rule 10 CFR Parts 34 and 150

For small business it seems we are getting handcuffed with Regulations that are costing more money to comply with and giving us less control to fit the regulations in with our procedures.

Certification for Radiographers is an example. Certification should be based on safety, operation of radioactive devices and the understanding of NRC regulations.

Certification should also come from the company the radiographer is working for. Each business who holds a NRC license must comply with NRC Regulations. The business must also adapt the regulations to his operations by making them cost effective and complying to that regulation.

Previous regulations have stated that radiographers should have training in radiation safety and also 520 hours of on the job training with radiographic equipment. NRC license's were also to conduct training course's, audits, and give examinations on safety and NRC regulations to each radiographer. Now it comes down to special group's that can only give the examinations to certify radiographers.

Small business should be able to:

1. Get the 40 hour training in the subjects listed for certification from companies that have NRC approved programs in radiation safety.
2. Document the 520 hours of on the job training with radiographic devices.
3. Make there own examinations and audit list adapted to their facility and operation and safety procedures.
4. Certify the radiographers working for their company only.
5. Most companies have safety rules and regulations that would be used in case of unsafe practice. The individual would be reprimanded under these safety rules. Individuals reprimanded would lose his radiographic certification or be given more instruction on the unsafe practice before resuming his duties as a radiographer.

9406060046 940523
PDR PR
34 59FR9429 PDR

Plant location: 1501 Frush Valley Road, Laureldale, Pa. 19605

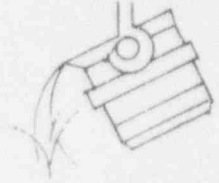
DS10

EMPIRE STEEL CASTINGS, INC.

ESC

STAINLESS • ALLOY • CARBON
STEEL CASTINGS

P.O. Bcx 139 • Reading, Pa. 19603-0139
Telephone 215 921-8101
FAX 215 921-9832



Radiographic operators with previous service and documented proof of complying with all the regulations to be a radiographer should be exempted from further certification. As long as he or she is still working for the same company that he or she is certified with.

ASNT has a good program and also other companies.

ASNT holds their exams for certification at their home office or at their conventions throughout the United States. The cost for a small business to send their personnel to different parts of the country to take these examinations would or could be very expensive. ASNT has so many local chapters it would cost less for a small business to send their personnel to the local chapter of ASNT to take these certifying examinations.

Previous courses and training as long as documented should be used for the qualification for both radiographers and radiation safety officers.

Sincerely;

A handwritten signature in cursive script that reads "Gene R. Gaumer".

Gene R. Gaumer
Radiation Safety Officer