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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

Attention: Docketing and Service Branch
Subject: Comments 10 CFR Part 34 proposed rulemaking

Gentlemen:

The following are my comments concerning the proposed 10 CFR changes:

Proposed 10 CFR 34.41 Conducting radiographic operation using 2 person crews

I agree with this position and the information provided, regarding improved safety and surveillance.

Proposed 10 CFR 34.42 Radiation Safety Officer

I agree with the additional training required. This person is a key member of any radiographic company. One should not forget that strong management support is required for any radiation safety program to be successful.

Central Certification of Radiographers

I have mixed reactions to this. Passing a test does not instill a strong safety attitude. This is done through management direction and strong enforcement by regulators. Individuals must now be held accountable for a violation of radiation safety requirements in order for this initiative to be successful.

Very truly yours,

MQS INSPECTION, INC.

Hugh V. Doran
Hugh V. Doran
President

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