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RADIOGRAPHY • ULTRASONICS
MAGNETIC PARTICLE • PENETRANT

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

6/2/94

Attn: Ms. Mary L. Thomas (Fax: 301-415-5385)

PROPOSED RULE PR 34-150
(59FR 9429)

Dear Ms. Thomas

Thank you for allowing me to fax these comments to you at this time. As per our conversation, I was unable to review a copy of the proposed rule changes until minutes ago.

Concerning the rule under consideration pertaining to requiring two radiographers at all "temporary jobsites", I am sure at many temporary jobsites overall safety would be enhanced.

However, I have a situation in which the requirement would not improve job safety and would probably put me out of business, unless an exception (as described in the middle of the middle column of page 9430 of Fed. Reg. Vol. 59, No. 39) could be granted.

I own a very small radiography service. I have a total of 3 licensed radiographers. Two of them are not full time employees, but I use them on an "as needed" basis, for typical "temporary jobsite" work.

But the bulk of my work is technically "temporary jobsite" work done by myself several times a week. I radiograph small propane tanks at a small local mfg. facility. I go to the plant during the off shift (usually around 4.00 A.M.) and do "spot RT" on some of the tanks they made that day. Prior to the RT work, I assure that all employees have left the shop. then I rope off and post my boundaries, which are also totally visible from where I work. After I am finished, I take down the ropes and signs and secure my equipment. I am usually out of there within an hour. If the day shift supervisor came in and the barriers were still up (for example if I fell over dead doing my work, heaven forbid), he has "emergency" phone numbers for my backup licensed radiographers and he knows to call them to come do surveys and secure the equipment, etc.

Admittedly, this is a "super small" operation. But it's how I earn my living. And it is as safe as radiography gets. Please don't put me out of business.

...

Kerry Creasey, Pres.

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