



DOCKET NUMBER
PROPOSED RULE PR34 & 150
(59 FR 9429)

DOCKETED
USNRC

40

'94 JUN -6 AIO:42

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

May 31, 1994

Mr. Samuel J. Chilk
Secretary of the Commission
ATTN: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Chilk:

NUCLEAR REGULATORY COMMISSION (NRC) - REQUEST FOR COMMENT ON PROPOSED
RULEMAKING 10 CFR PARTS 34 AND 150, LICENSES FOR RADIOGRAPHY AND
RADIATION SAFETY REQUIREMENTS FOR RADIOGRAPHIC OPERATIONS

The Tennessee Valley Authority (TVA) has reviewed the subject proposed
rulemaking, which was noticed in the February 28, 1994, Federal Register
(59 FR 9429-9448), and is pleased to provide the following comments on
10 CFR Part 34.

General Comments:

If adopted, the Part 34 proposals would result in a significant change
in radiography program requirements that would increase the cost of
performing radiography.

Many of the changes have the potential to enhance the level of
protection of radiographers and the general public. These, in part,
include: the minimum two-man rule, surveys for depleted uranium
contamination, development of procedures for emergency source recovery,
record of corrective actions taken for the repair of defective
equipment, inclusion of associated equipment in the licensee's
inspection and maintenance program and a revised method for conducting
surveys of exposure devices.

A proposed reduction in the frequency of field inspections of
radiography personnel who have remained proficient (from quarterly to
annually) is a positive change.

Specific Comments:

Part 34.23b Proposes, in part that, "exposure devices, source
changers, and storage containers, before being moved
from one location to another must have the guide tubes
and control cables disconnected, safety plugs or
covers applied, locked and physically secured to
prevent accidental loss, tampering or removal of
licensed material."

9406090014 940531
PDR PR
34 59FR9429 PDR

DS/D

Mr. Samuel J. Chilk
Page 2
May 31, 1994

Comment: This is a proposal that will help prevent overexposures and should be adopted, but the words "being moved from one location to another . . ." need to be clarified. Recommended wording could include: . . . before being picked up and carried or transported (as long as ALARA has not been compromised) to another location . . ."

If a licensee takes exception to the proposal, the licensee should identify the method for safely moving exposure devices in their operating and emergency procedures.

Part 34.41 Proposes that "The additional qualified individual(s) shall observe the operations and be capable of providing immediate assistance to prevent unauthorized entry."

Comment: We recommend deleting "shall observe the operations." Emphasis should be placed on the capability to provide assistance without focusing on whether the individual is an observer or performing other tasks related to radiography.

Part 34.47(g) The proposed revision would require "alarm ratemeters be capable of alerting the wearer regardless of environmental conditions."

Comment: It is not certain whether a requirement for alarm ratemeters that alert regardless of environment will be met by vibrating system or hearing protectors.

The meter must be flexible enough to operate effectively in the varied work environments encountered by radiographers. If a radiographer enters a field of radiation in excess of 500 mrem, it is normally an indication of a problem at or near the exposure device. A radiation monitor located on or near the exposure device might be a more effective location, or serve as an option to the proposed 34.47(g) requirement.

Part 34.89 Proposes that licensees maintain copies of documentation "sufficient to demonstrate compliance" at field stations and permanent installations.

Mr. Samuel J. Chilk
Page 3
May 31, 1994

Comment: This requires maintenance of potentially voluminous records that would normally be kept at a licensee's main facility. A distinction should be made for field stations that are used only for briefly scoring and dispatching of equipment. Such field stations should not be required to maintain training, quarterly maintenance, and inventory records if it is not used as a business office or for conducting radiography. Proposed Part 34.89 does not indicate flexibility on this issue.

TVA appreciates this opportunity to comment.

Sincerely,



for Roger W. Huston
Manager
Nuclear Licensing and Regulatory Affairs

cc: U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Dr. Donald O. Nellis
Office of Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555