

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTHRADIATION HEALTH UNIT
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ADDRESS REPLY TO:
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OFFICE OF THE
DOCKETING SERVICE
BRANCH

March 17, 1988

Secretary, U.S. NRC
Washington, DC 20555

Attention: Docketing & Service Branch

Subject: Comments on Proposed Rule Making on Safety Requirements for Industrial
Radiographic Equipment under 10CFR 34

1. Paragraph 34.20(b)(2). On the exposure device statement of rated capacity.
Ex. 100 curies Iridium 192
2. Paragraph 34.20(c)(10). Source changers being in themselves unique as
opposed to exposure devices should be seperated out. Ex. 34.20(f)
3. Paragraph 34.33(b)(2). If an alarm signal trigger is to be set at 500mr/hr
it will pose a problem to perform a prior to exposure device use because it
may require purchase of a check source which would require a specific license.
If so this will have an added cost impact initially as well as annual and es-
timated to be several hundred dollars initially and \$50 annual ex. License
Fee and leak test requirements.

General Comments this ANPR:

1. ANSI N432 uses the term apparatus as opposed to exposure device
2. Just as in teletherapy acceptable dose-rates calling for a maximum
acceptable and average acceptable, this could be worded in the proposed
regulatory change paragraph 34.21
3. There is need to review material of construction and design for the
source assembly. The defect "bird caging" has occurred to a number
of source assemblies

DS10/10
add. Donald A. Hellis, H-028

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4. There is need to review material of construction, design, the quality assurance to the end of drive cables where it connects to the source assemblies due to defects from prolonged usage. Ex. the source assemblies is expected to be changed numerous times before the drive cable.

These are my comments on the proposed rule changes

Yours truly

Kim S. Wong

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c.c. Dr. D. O.Nellis/USNRC

Jack McGurk/State of CA