

DOCKET NUMBER
PROPOSED RULE

75
PR 34
(53FR 8460)
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USNRC

August 1, 1988

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington DC 20555

OFFICE OF THE
DOCKETING
BRANCH

Attention: Docketing and Service Branch

Subject: Proposed Rules on Industrial
Radiographic Equipment

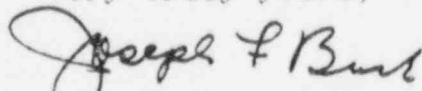
The following are comments relative to the ASNT survey and the subject rules.

- 1) The average life of exposure devices should be more on the order of twelve years. Six out of seven devices purchased around 1967 are still working fine at our company.
- 2) The cost analysis of \$100.00 per year is very low. If our company had to replace six devices with comparable models, the price would be \$5800.000 each (Tech OPPS 660). With all the proposed rules an additional cost of \$1000.00 is not unlikely. That is an average cost of \$1200.00 per year. However, if you consider the devices would not have been replaced over that period, the cost is significantly higher.

In conclusion I would like to point out that the best safety feature you can give the radiographer is training and a survey meter. Without those items all the gadgets that are proposed will not increase safety. If a radiographer won't use a survey meter now, what is going to make him use and alarming dosimeter or watch a source position indicator in the future?

I suggest a licensing program that puts the responsibility on the radiographer.

Very truly yours,



Joseph F. Bush
Member ASNT

Avondale
Industries,
inc.

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JFB/snp

CC ASNT w/survey

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The American Society for Nondestructive Testing, Inc.

Member Survey regarding:

Proposed Safety Requirements for Industrial Radiographic Equipment

INSTRUCTIONS

Before answering the survey questions, read all the material contained in this packet regarding the proposed rules. Below, in statement format, are the 11 proposed rules which most directly affect industrial radiographic equipment users. For each proposed rule, you are given the choice of agreeing (being in favor of that proposed rule), disagreeing (being opposed to that proposed rule) or offering no opinion. Two demographic questions are also included. Check only one answer per question. Specific comments or questions about the proposed rules should be sent directly to the appropriate NRC address indicated in the enclosed memo. Comments to ASNT may be provided on additional sheet(s) of paper and returned with the survey.

Please return this survey, NO LATER THAN THURSDAY, JULY 28 to:

ASNT
Attn: Tim Strawn
4153 Arlingate Plaza
Caller #28518
Columbus, OH 43228-0518

Thanks for your interest and co-operation in this effort.

QUESTIONS

1. Are you currently or have you previously been a user of industrial radiography equipment?

XX Yes _____ No

2. Are you sending comments on these proposed rules directly to the NRC in addition to returning this survey to ASNT headquarters?

XX Yes _____ No

3. Radiography equipment shall incorporate the provisions of ANSI N432, "Radiological Safety for the Design and Construction of Apparatus for Gamma Radiography" (reference: National Bureau of Standards Handbook 136).

_____ Agree XX Disagree _____ No Opinion

4. The coupling of the source assembly to the drive cable shall consist of application of motion in two planes and a positive force in at least one of the planes. The coupling must be designed so that it cannot be unintentionally disconnected.

XX Agree _____ Disagree _____ No Opinion

(over, please)