



DOCKET NUMBER
PROPOSED RULE

PR-34 (53 FR 8460)

(12)

THE AMERICAN SOCIETY FOR
NONDESTRUCTIVE TESTING, INC.

OFFICERS AND DIRECTORS
1987-88

CHAIRMAN OF THE BOARD
Don Earl Edwards - 1988
Edwards Pipeline Testing, Inc.
(918) 562-1781

PRESIDENT

Ross A. Beckley - 1989
Pennsylvania Power & Light Co.
(717) 542-2151 X2850

VICE PRESIDENT

Robert A. Baker - 1990
Pennsylvania Power & Light Co.
(717) 542-2151 X2862

TREASURER

Maryellen Robards - 1991
MQS Inspection, Inc.
(216) 267-4142

SECRETARY

John E. Rusing - 1992
Raj Technology, Inc.
(312) 470-9552

TECH COUNCIL

Eugene S. Monks - 1988
General Electric Co.
(513) 552-4690

E&G COUNCIL

E. Dan Harvey - 1988
Monsanto Research Corp.
(513) 865-3274

SDC COUNCIL

John A. Stringer - 1988
General Dynamics/EB Division
(401) 268-2676

MANAGING DIRECTOR

Desmond D. Dewey

BOARD OF DIRECTORS

Jerry Berg - 1990
Berg Engineering & Sales
(312) 577-3980

Joseph F. Bust - 1988
Avondale Industries
(504) 436-5115

Har Dale - 1989
EI duPont
(800) 345-9999 (dial 74)

Walter A. Graeme, Jr. - 1988
EI duPont
(302) 992-2134

Edmund G. Henneke - 1989
VA Polytechnic Institute
& State University
(703) 961-5316

George A. Matckanin - 1989
Southwest Research Institute
(512) 522-2737

George Moran - 1989
PSEG Research Corp.
(201) 761-1708

Vicki Panhuse - 1988
Garrett Turbine Engine Co.
(602) 231-2911

Robert J. Phelan - 1988
Agfa-Gevaert, Inc.
(201) 807-2005

Ronald B. Rodgers - 1988
General Electric Co.
(513) 243-1626

Gregory A. Rosier - 1989
Cherne Contracting Corp.
(612) 944-2650

Hussein M. Sadek - 1990
Law Engineering Ind. Svs.
(704) 523-2022

Sotirios J. Vahaviolos - 1988
Physical Acoustics Corp.
(609) 896-2255

Allen Wehrmeister - 1990
H.A.F.A. International, Inc.
(305) 848-5252

Gary L. Workman - 1989
Univ. of Alabama - Huntsville
(205) 895-6257

4153 ARLINGATE PLAZA • GALLER • 2558 • COLUMBUS, OHIO • 3228-0518
NATIONAL 1-800-222-ASNT • OHIO 1-800-NDT-OHIO • TELEX 245347

OFFICE OF THE
DOCKETING & SERVICE
BRANCH

May 2, 1988

From the Office of:
Ross A. Beckley
President

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555
Attention: Docketing and Service Branch

RE: Proposed Rule, 10CFR Part 34 Federal Register Vol. 53, No. 50

This request is written by the American Society For Nondestructive Testing, Inc., ASNT, on behalf of it's member User Groups.

ASNT respectfully requests the Regulatory Commission to grant a ninety (90) day extension to their proposed rules comment period relative to "Safety Requirements for Industrial Radiographic Equipment", 10CFR Part 34 which was published in the Federal Register, Vol. 53, No. 50 on March 15, 1988. It is noted that the sixty (60) day comment period expires May 16, 1988.

The granting of an extension would be beneficial for the following reasons:

- o The proposed rules are extensive and will financially impact most user company's who conduct radiographic operations.
- o The cost analysis published by the Commission vastly underestimates realistic estimates. NRC estimated annual cost per licensee for replacement of exposure devices of \$100.00 is not realistic.
- o Insufficient time to evaluate overall impact on User Groups.

Thank you for your consideration.

Ross A. Beckley
Ross A. Beckley
President

American Society For Nondestructive Testing

cc: Board of Directors
D. D. Dewey
R. A. Beckley (File)
IRSCC Task Group

8805240365 880502
PDR PR
34 53FR8460 PDR

DSIO

Materials Evaluation

An Official Journal of the American Society for Nondestructive Testing