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PROPOSED RULE  
(53 FR 8460)

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May 9, 1988

OFFICE OF THE SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

SUBJECT: 10 CFR Part 34 Safety Requirements  
For Industrial Radiography Equipment

Gentlemen:

My comments on the proposed changes to Title 10 CFR Part 34 are as follows:

It is my opinion that of the actions now under consideration by the NRC to alleviate the problem for overexposure, the most successfully would be:

- a. A training manual for radiographers.
- b. Improved training program for radiographers.
- c. Increased monitoring of actual radiographic operations.
- d. Providing additional guidance for reporting events and equipment malfunctions.
- e. Establishment of safety requirements for radiographic equipment.

In addition to the above, I would add the requirement that radiography in field applications require two men. Since, in my opinion, the size, complexity and accessibility of most radiation areas cannot be adequately or safely maintained by an individual.

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**MQS**

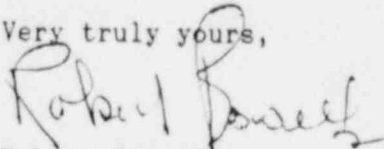
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Secretary  
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The addition of a visual position indicator on the source and using alarm dosimetry might alleviate the problems of overexposure, but the major problem is already documented as not using a survey meter/or failure to take surveys. I believe, the answer is the individual radiographer through better training and adherence to the procedures for the safe handling of radiographic services.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Robert Boswell".

Robert Boswell  
Radiographic Supervisor

RB:sf