

DOCKET NUMBER  
PETITION RULE PRM 34-4  
(57 FR 57392)

38



'93 FEB -8 P4:19

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

RECEIVED  
DOCKETING  
BRANCH

February 1, 1993

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 PETITION FOR  
RULEMAKING (PRM-34-4), 10 CFR 34, RADIATION SAFETY REQUIREMENTS

The Tennessee Valley Authority (TVA) has reviewed the subject petition for  
rulemaking, which was noticed in the December 4, 1992 Federal Register  
(57 FR 57392), and is pleased to provide the following comments.

TVA believes that the requested change to 10 CFR Part 34 would help ensure a  
safer working environment. It is very important that an amendment resulting  
in a minimum two person rule allow the licensee the flexibility to determine  
the personnel comprising the two person team. The "solution" discussed in the  
subject notice should provide that flexibility.

If adopted, the rule should be limited, as proposed, to temporary job sites.  
The two person rule should not be invoked for each radiography source used by  
a licensee when more than one radiography source is used in close proximity to  
another source. In such situations, the licensee may be capable of safety  
controlling radiographic operations without assigning two persons to each  
source. We assume this is the petitioner's intention.

TVA appreciates this opportunity to comment.

Sincerely,

*Ralph H. Shell*

Mark J. Burzynski  
Manager  
Nuclear Licensing and Regulatory Affairs

cc: See page 2

9302170032 930201  
PDR PRM  
34-4 PDR

DS10

Mr. Samuel J. Chilk  
Page 2  
February 1, 1993

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

Mr. Michael T. Lesar  
Rules Review Section  
Rules and Directives Review Branch  
Division of Freedom of Information and Publications Services  
Office of Administration  
Washington, DC 20555