



FILE PRM 34-4
(57 FR 57392)

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CBI Services, Inc.

January 26, 1993

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

Attention: Docketing and Service Branch

Subject: 10 CFR Part 34
Docket No. PRM-34-4
Petition for Rulemaking
Comments on Proposed Rules
Dated Dec. 4, 1992/Vol. 57, No. 234

Gentlemen:

The following are the Writer's comments regarding the above referenced proposed rules.

We support the proposed rules to require that there be a minimum of a two person team to perform radiographic operations at temporary job sites. The problems stated by Petitioner are real and need to be addressed. This is an excellent proposal. Many organizations including CBI already perform field radiography at temporary job sites with two person teams.

We do not agree with item (3) of "The solution". We suggest deletion of item (3) which creates the undefined category of "trainee". We also suggest deletion of the paragraph which would require that this "trainee" must have successfully completed 40 hours of approved radiation safety instruction and passed an examination covering the topics of instruction.

For over twenty seven years CBI has successfully performed isotope radiography throughout the Western States without a major incident. We qualify a radiographer assistant in a four to six hour, one-on-one training session, to teach the operation of the exposure device(s), and related exposure and monitoring equipment, along with a review of the operating and emergency procedures, and an examination on the topics of instruction. After the individual has obtained the necessary experience as a radiographer assistant, and has successfully completed a 40 hour class of instruction on approved radiation safety training, and passed an examination on the topics covered, they may be qualified as an isotope radiographer. We believe this sequence of training coupled with the use of a two person team for our temporary job sites is a major reason CBI has been able to maintain a good isotope radiography safety record.

A "trainee" with little or no radiography experience would retain much less from a forty hour training course than an individual who is already employed as a radiographer assistant. The experience obtained as a radiographer assistant provides the individual with a valuable background and foundation to fully benefit from more extensive training.

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For these reasons, it is our opinion that creating the category of "trainee" with a 40 hour training and examination requirement will not improve safety. It may even produce "trainees" who are not as safe as the current radiographer assistants. Further, we do not see that creating a category of "trainee" is pertinent the central issue of the proposed rule for a two person radiography team for temporary job sites.

We appreciate the opportunity to comment on this matter.

William F. Walsh

William F. Walsh
District Radiation Safety Officer