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PETITION RULE PRM 34-4
(57FR 57392)

(37)

CBI Services, Inc.

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January 25, 1993

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DOCKETING & SERVICE
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U.S. NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555

Attn: Docketing and Service Branch

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

Gentlemen:

I appreciate the opportunity to comment on the above proposal and would like to offer the following for your consideration:

1. I support the proposal mandating a minimum of two individuals when performing radiographic operations at temporary jobsites. I further suggest the wording of the proposed ruling be explicit in the requirement that both be present whenever licensed material is exposed outside the exposure device.

Many safety conscious organizations have already recognized and incorporated this benefit into their current radiation safety programs.

2. I do not see the necessity for creating an undefined category of "trainee". 10CFR Part 34 currently defines "Radiographer" and "Radiographer's Assistant" and licensee's programs have been written around these definitions; the addition of a third classification would not appear to be of significant benefit.

Sincerely yours,

G.F. McLish, DRSO
CBI Services, Inc.

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