



a national construction services organization

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January 25, 1993

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Docketing and Service Branch

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

Gentlemen:

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

Affirmative comment - We support the proposed rule to require that there be a minimum of a two person team to perform radiographic operations at temporary jobsites. This is an excellent proposal. Many organizations already perform field radiography at temporary jobsites with two person teams.

Negative comment - 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 forty hours of approved radiation safety and passed an examination over the topics of instruction.

For over twenty-seven years CBI has successfully performed isotope radiography worldwide 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. Once the individual has obtained the necessary experience as a radiographer assistant and has successfully completed forty hours of 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 jobsites 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



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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 the background and foundation to fully benefit from more extensive training.

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

We appreciate the opportunity to comment on this matter.

Phil Belt
CBI Na-Con, Inc.
Plainfield Radiation Safety Officer

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