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(57FR 57392)

# Grinnell

CORPORATION

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TECHNICAL SERVICES

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February 2, 1993

The Office of the Secretary  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Docketing and Service Branch

Subject: Docket No. PRN34-4  
Amendment to 10CFR Part 34

Gentlemen:

As a very active and involved license holder (NRC License No. 38-28750-01), we have recognized the liabilities associated with providing one radiographer at temporary job sites. As an organization, we wholeheartedly endorse the current petition requesting that the NRC amend 10CFR Part 34, "Licensee for Radiography and Radiation Safety Requirements For Radiographic Operations," to require a minimum of two radiographic personnel when performing industrial radiography with licensed material at temporary job sites.

This in particular represents the recent petition which was presented by the International Union of Operating Engineers, Local #2. Additional details are outlined in the Federal Register, Volume #57, No. 234 Friday, December 4, 1992. Additionally, we agree with the items outlined which note problems with the existing rules and offers solutions.

Over the past 6-8 months, we have submitted the attached letter (Radiographic Inspections - Two Man Crew Considerations) with proposals and general correspondence to our customers. With respect to the use of cobalt material for inspections, our company policy currently involves the use of a mandatory two man crew. This should further illustrate our support of the proposed amendment.

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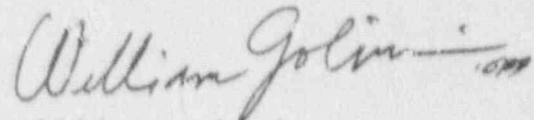
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Over the past year we have also discussed this issue with our customers as a two man crew would obviously represent an increase in costs. In general, we have found very few objections to the proposed amendment from utilities, contractors and fabricators for whom we provide services.

Again, Grinnell Corporation management and all radiographic personnel are advocates of this amendment and will assist the NRC with any further information required to expedite this rule change process.

Very truly yours,

GRINNELL CORPORATION

A handwritten signature in dark ink, appearing to read "William Golini", with a horizontal line extending from the end of the signature.

William Golini  
Radiation Safety Officer

WG:dad

cc: G. T. Mulvaney  
Frank Costello/NRC Region 1  
J. I. [unclear]  
R. T. [unclear]  
J. DeSantis

# RADIOGRAPHIC INSPECTIONS

## TWO MAN CREW CONSIDERATIONS

Unlike the majority of nondestructive inspection techniques, radiographic inspections which utilize isotopes can have an impact on the safety of the general public. As a result, these activities and most related aspects are controlled by the Nuclear Regulatory Commission (NRC). Currently the NRC and the majority of states do not have mandatory two man crew requirements. However, as both an enhancement to our safety program and as a means to efficiently comply with the established rules and regulations, our preference is to supply a two man crew for radiographic inspections.

In order to be competitive with other organizations and suppliers of this technique, costs associated with a single radiographer have been provided. We would appreciate your serious consideration for use of a two man crew for radiographic inspection services. With respect to radiography utilizing cobalt, our company policy currently involves a mandatory two man crew.

In the event that you would like additional information or if you have any questions, please direct them to the following individuals:

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Off hour emergency numbers and contacts involve the following:

George Mulvaney (home)	(401) 828-8426
George Mulvaney (pager)	(401) 276-8743
William Golini (pager)	(401) 276-8588