



DOCKET NUMBER

PRM 34-4

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CBI Services, Inc.

(57 FR 57392)

January 27, 1993

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing & 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:

As a licensed user of radioactive materials, we have the following 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 job sites. This is an excellent proposal. Many organizations already perform field radiography at temporary job sites 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 40 hours of approved radiation safety and passed an examination over the topics of instruction.

During the last six years CBI Services, Inc., has successfully performed isotope radiography in the Northeastern USA without a major incident. We qualify a radiographer's 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's assistant and has successfully completed the 40 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 job sites is a major reason CBI Services, Inc., 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's assistant. The experience obtained as a radiographer's assistant provides the individual with the background and understanding 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 a worker as the current radiographer's 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 job sites.

We appreciate the opportunity to comment on this matter.

Sincerely yours,

CBI SERVICES, INC.

A handwritten signature in dark ink, appearing to read "Larry B. Rohrer", is written over the typed name.

Larry B. Rohrer
District Radiation Safety Officer

LBR/jlg