



Carolina Power & Light Company

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PETITION RULE PRM 34-4
(57 FR 57392)

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Secretary
United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Docketing and Service Branch

Docket No. PRM-34-4 (10 CFR Part 34)

RESPONSE TO FEDERAL REGISTER VOLUME 57, NO. 234, DECEMBER 4, 1992

Gentlemen:

Carolina Power & Light Company (CP&L) appreciates the opportunity to provide comments on the petition for rulemaking as identified in the Federal Register. Carolina Power & Light Company does not agree with the changes to 10 CFR 34 the petitioner has requested, and believes that a change to the regulations as requested by the petitioner would place an unwarranted burden on licensees.

10 CFR 34 identifies qualification requirements of the personnel who perform radiographic work, i.e., the radiographer. The number of personnel and qualification levels of those personnel necessary to assist the radiographer should be dictated by the licensee's Radiation Safety Program. The circumstances of the radiographic work, such as work location, job complexity, radiograph's equipment, safety considerations, and required expertise should be some of the criteria used in determining the team composition for a given radiographic work assignment. In some cases, one radiographer is sufficient to perform work in a safe manner. The holder of the license for radiography and radiation safety is responsible for proper working conditions and complying with Code requirements. The licensee should therefore be allowed to determine the number and (beyond the radiographer) the level of qualification of the persons assisting the radiographer needed for specific radiographic work.

In summary, the licensee's Radiation Safety Program should determine the number of personnel to perform specific radiographic work.

If you have any questions concerning this information, please contact Mr. Dale Bates at (919) 546-6154.

Yours very truly,

David C. McCarthy
Manager

Nuclear Licensing Section

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