



MATTINGLY TESTING SERVICES, INC.

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U.S. NUCLEAR REGULATORY COMMISSION
DOCKETING AND SERVICE BRANCH

January 29, 1993

Secretary, U.S.N.R.C.
Attention: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: Docket # PRM-34-4/Petition against the proposed two man requirement for industrial radiography.

Attention: John C. Hoyle, Secretary

Concerning the proposed mandatory two person radiographic personnel rule, it is our position that final decision as to whether a two person crew is needed on the job site should rest with the management of the inspection company. Having a two person crew would drive costs of radiography operations higher. Since the N.R.C. already raised the licensing fees for RT inspection companies, the proposed rule will drive RT inspection costs even higher.

Very rarely is the radiographer completely alone. Furthermore, if a single radiographer is not capable of maintaining and enforcing the radiation area and high radiation area boundaries in accordance with 10 CFR, then at least two radiographers or at least one radiographer and one assistant should be sent by the company. A "trainee" with 40 hours of radiation safety training and that has successfully passed a comprehensive written exam should be considered a radiographer's assistant.

Each individual job is evaluated by the inspection company as to number of radiographers or assistants required, therefore, we feel the final responsibility as to the number of personnel sent should remain with the inspection company.

Respectfully,
MATTINGLY TESTING SERVICES, INC.

Mark M. Mattingly, RSO