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(57 FR 57392)

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CVM-243-93

January 21, 1993

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: 10CFR Part 34  
Docket No. PRM-34-4  
Petition for Rulemaking  
Comments on Proposed Rules  
Dated Dec. 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 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 and 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 a examination on the topics of instruction. Once the individual has obtained the necessary experience as a radiographer 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 has been able to maintain a good isotope radiography safety record.

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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 assistant. The experience obtained as a radiographer assistant provides the individual with the background and foundation to fully benefit from more extensive training.

Per these reasons, it is our opinion that creating the category of "trainee" with a 40 hours training and examination requirement will not improve safety. It may even produce "trainees" who are not as safe 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 job sites.

We appreciate the opportunity to comment on this matter.

A handwritten signature in dark ink, reading "Michael S. Rebenack". The signature is fluid and cursive, with the first name "Michael" and last name "Rebenack" clearly distinguishable.

Michael Rebenack  
District Radiation Safety Officer  
U.S. Virgin Islands Area