

# Air Transport Association

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DOCKET NUMBER

PETITION RULE PRM-34-2(43FR34563)

September 28, 1978

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Attn: Docketing and Service Branch  
Washington, D.C. 20555

Dear Mr. Secretary:

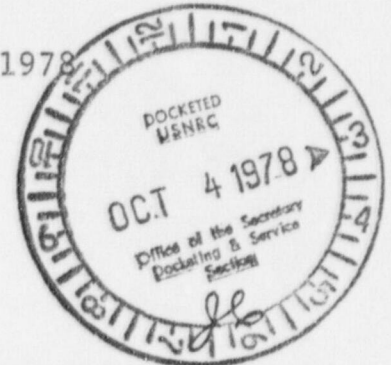
This is in reply to a petition (Docket No. PRM-34-2) filed by the Non-Destructive Testing Management Association and published in 43 CFR 34563 on August 4, 1978, about registration, licensing and control of industrial radiographers.

The scheduled airlines strongly object to the proposal made by the NDTMA. No evidence or proof is offered by the NDTMA to support their contention that registration and licensing of industrial radiographers will in fact reduce the already small incidence of exposure of personnel to radiation.

The key to radiation safety, as with any other kind of safety, is proper training and qualification of personnel and the exercise of effective management over these people. As you know, all users of radioisotopes for industrial radiography are now required to be licensed by the NRC or the appropriate authorities within agreement states. Such licensing also requires the proper training, qualification and management of radiographers.

In the case of U.S. scheduled airlines, radiographers are airmen licensed by the FAA as Airframe and Powerplant Mechanics or as Repairmen. In addition, the airline is required by FAR Part 121 to properly train and qualify such personnel and provide any manuals needed by these people to perform their duties.

The responsibility for radiographic operations including radiographer qualifications and conduct rests with the radiographer's licensed employer. Fulfillment of these responsibilities is now monitored by federal and state agencies. The licensee has a vested interest in demanding proper radiographer conduct and training.



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As an employer, he also has the ability to levy financial penalty up to termination of employment for the types of negligent conduct presented in the petition. Therefore, the scheduled airlines believe that current NRC, FAA and state regulations already provide adequate control of radiographer conduct without the unnecessary burden of an additional overlay of licensing requirements.

The possible impact of the proposal is perhaps exemplified by United Airline's situation. United has 38 qualified radiographers covering a 24-hour, seven-day week operation. The financial impact of NRC licensing these inspectors would be economically prohibitive. United would have to provide time, material and administrative effort to put the proposed licensing process into effect.

The proposed rule change would be redundant and wasteful and would have no effect on the licensee's radiation safety responsibilities. Therefore, the proposed rule change should not be adopted.

Sincerely,

*V. W. Belanger*

*for*

E. L. Thomas  
Assistant Vice President  
- Engineering