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RECORD #187

TITLE: 34.2(b) and (c) - Definitions - Radiographer and  
Radiographer's Assistant

FICHE:

34.2(b) and (c) - DEFINITIONS -- RADIOGRAPHER AND RADIOGRAPHER'S ASSISTANT

Discussion

As specified in Section 34.2(b), 10 CFR Part 34, a "radiographer" means any individual who performs or who, in attendance at the site where the sealed source or sources are being used, personally supervises radiographic operations and who is responsible to the licensee for assuring compliance with the requirements of the Commission's regulations and the conditions of the license. Section 34.2(c), 10 CFR Part 34 defines a "radiographer's assistant" as any individual who, under the personal supervision of a radiographer, uses radiographic exposure devices, sealed sources or related handling tools, or radiation survey instruments in radiography.

Licensing has construed (with OGC concurrence) these definitions to mean that a radiographer must be physically present at the site where the radiography is taking place. This does not mean in the vicinity of or near the site of exposure but the site where the actual radiographic operation is being conducted. A radiographer's assistant may not perform any operation unless the radiographer is physically present to personally supervise the operation.

In Section I of the licensing guide for radiography, it is pointed out that (1) the duties and responsibilities of the radiographer may not be delegated to a radiographer's assistant and (2) any individual who assists a radiographer by manipulating radiographic exposure devices, sealed sources, related handling tools, or survey instruments is acting in the capacity of a radiographer's assistant and must meet the requirements of Section 34.31(b), 10 CFR Part 34.

Inspection Elements

See Chapter 7200

34.2-1

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DEFINITIONS - RADIOGRAPHER AND RADIOGRAPHER'S ASSISTANT (cont'd)

It would be possible for a radiographer to supervise the activities of more than one radiographer's assistant. For example, an in-plant operation with more than one radiographic cell could involve a number of radiographers' assistants and only one radiographer. In such a situation, the radiographer would need to be physically present while any manipulation of the exposure device or survey is being performed. This process could be repeated for the several radiographers' assistants.

It is usually the intent of radiographic licensees to qualify individuals to act as radiographers and the vast majority of programs do not have "career" radiographers' assistants. The designation of radiographer's assistant is usually intended for a person who is being trained as a radiographer and must meet the requirements to act as a radiographer's assistant in order that he may gain the necessary training and experience which is necessary for an individual to qualify as a radiographer.