



# Conference of Radiation Control Program Directors, Inc.

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**DOCKET NUMBER**  
**PETITION FILE PRM 34-06**  
**(70 FR 76724)**

February 3, 2006

Ms. Annette L. Vietti-Cook, Secretary  
U. S. Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

DOCKETED  
USNRC

February 13, 2006 (4:16pm)

Re: NRC Docket No. PRM-34-06

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear Ms. Cook:

On behalf of the Board of Directors of the Conference of Radiation Control Program Directors, Inc. (CRCPD), I would like to convey our strong support for the Organization of Agreement States' (OAS) petition for rulemaking to amend Title 10 of the Code of Federal Regulations (CFR) Part 34 (NRC docket No. PRM-34-06, published in Federal Register/Volume 70, No. 248/December 28, 2005). Among other important points, the petition requests that the Nuclear Regulatory Commission (NRC) amend 10 CFR 34.43 to require an accepted 40-hour training course for radiographer assistants, and that the NRC change its interpretation of the so-called "two-person crew" rule and its interpretation in 10 CFR 34.51 and NUREG-1556 Volume 2, respectively.

The Conference of Radiation Control Program Directors, Inc. (CRCPD) is a nonprofit, non-governmental professional organization that promotes consistency in addressing and resolving radiation protection issues, encourages high standards of quality in radiation protection programs, and provides leadership in radiation safety and education. Membership of CRCPD consists of approximately 800 radiation professionals from the radiation control programs of the fifty States, Indian Tribes, Puerto Rico, Federal agencies, academia, and other individuals interested in radiation issues.

The CRCPD Board of Directors continues to fully support and encourage the collaborative partnership with NRC and OAS for the development and implementation of uniform and consistent regulations that promote public health and safety. The Board welcomes this opportunity to lend its support to this worthwhile petition.

Thank you for your consideration. If there are any questions concerning the CRCPD Board position on the petition, please contact me at (360) 236-3251 or [debra.mcbaugh@doh.wa.gov](mailto:debra.mcbaugh@doh.wa.gov).

Sincerely,

Debra McBaugh, Chair  
Conference of Radiation Control Program Directors, Inc.

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