

PRM-35-20
(71FR64168)

DOCKETED
USNRC

January 11, 2007 (4:06pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

PRM-35-20
(71FR64168)

16

From: Brian Hames brian.hames@centrahealth.com
To: SECY@nrc.gov
Subject: Comment on Proposed Rule PRM-35-20

NRC Staff,

I am a medical physicist with certification by the ABMP in therapeutic physics issued in 1997. I have worked as a full-time physicist for over sixteen years and my duties have included RSO or assistant RSO for fourteen of those years. Part of my commitment to the position of RSO has been a detailed study and adherence to the regulations set forth by the NRC regarding medical use of radioisotopes and general radiation safety. I believe experience plays a large role in performing the duties of RSO since many situations arise that are(were) not predicted during classroom teaching or board examination. Therefore, I am concerned with the current proposed rules which do not take into account certification by the ABMP or ABR certificates issued before October 2005. The proposed rules, if passed, will impart an undue burden on myself as well as many of my colleagues to continue practicing in our current or future capacity as medical physicists and/or RSOs. This in turn, will likely create a shortage of medical physicists to perform the role of RSO to implement and adhere to your radiation safety regulations.

I am writing in support of the AAPMs' petition to include a "grandfather" clause to include those previously (pre-10/05) certified by the ABMP and ABR to be able to continue in their professions as RSOs and AMPs.

Thank you for your consideration in this matter.

Sincerely,

Brian R. Hames, MS, DABMP
Director of Physics and RSO
Centra Health
Lynchburg, VA 24503
434-947-7406

Template = SECY-067

SECY-02

From: Carol Gallagher
To: SECY
Date: Thu, Jan 11, 2007 12:33 PM
Subject: Comment on PRM-35-20

Attached for docketing is a comment letter on the above noted PRM that I received via the rulemaking website on 1/11/07.

The commenter's address is:

Brian Hames
3300 Rivermont Ave.
Lynchburg VA 24503
brian.hames@centrahealth.com

Carol

Mail Envelope Properties (45A674EB.255 : 5 : 35764)

Subject: Comment on PRM-35-20
Creation Date Thu, Jan 11, 2007 12:33 PM
From: Carol Gallagher

Created By: CAG@nrc.gov

Recipients

nrc.gov

TWGWPO02.HQGWDO01

SECY (SECY)

Post Office

TWGWPO02.HQGWDO01

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	869	Thursday, January 11, 2007 12:33 PM
TEXT.htm	643	
1795-0013.doc	26624	Thursday, January 11, 2007 12:31 PM

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is not eligible for Junk Mail handling
Message is from an internal sender

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled