

PRM-35-20
(71FR64168)

DOCKETED
USNRC

January 16, 2007 (3:17pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

January 15, 2007

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

39

Re: PRM-35-20

Dear Ms. Vietti-Cook:

Thank you for the opportunity to comment on the petition for rulemaking filed by E. Russell Ritenour, Ph.D., on behalf of the American Association of Medical Physicists as published in the Federal Register Vol. 71 No. 211 on November 1, 2006. Mr. Ritenour's petition seeks to restore the recognition of diplomates of certifying boards that were previously recognized in 10 CFR Part 35 prior to October 25, 2005.

As a diplomate of the American Board of Health Physics, I support this petition for rulemaking; and urge the Commission to amend its regulations as stated in paragraph 4.2 of the petition to "recognize individuals that were certified by a board that was listed in Subpart J of the of the old regulations for . . . §§ 35.50 (RSO) . . . prior to October 24, 2005."

Although the petition specifically focuses on the American Board of Radiology and the American Board of Medical Physics in its discussion of this portion of the proposed rule change, the proposed change presented to the Commission is more general. As such it includes recognition of individuals certified by the American Board of Health Physics (ABHP) as meeting the training and education (T&E) requirements to be an RSO on a medical license.

The current regulations require that individuals certified prior to October 25, 2005 by the ABHP be forced to use the alternate pathway. There is no evidence that support the assertion implicit in the current regulations that individuals certified prior to 2005 are any less capable of performing as RSO. Therefore, these additional steps pose a burden upon individuals and licensees without a corresponding increase in public or worker health and safety.

I believe that my certification by the ABHP establishes my credentials as a radiation safety professional. The ABHP comprehensive certification exam is devoted to radiation safety and training and has included medical applications since its inception. Therefore, I believe that individuals considered qualified to be RSO prior to October 25, 2005 by virtue of their board certification should continue to be considered qualified to hold this position.

Template=SECY-067

SECY-02

In conclusion, as a certified health physicist, I believe that my certification by the ABHP establishes that I have the requisite training and education to serve as an RSO at a medical institution. I encourage the Commission to favorably consider the petition for rulemaking and modify 10 CFR 35 to recognize the certifications of those individuals who met the Part 35 training and experience requirements for RSO as of October 25, 2005.

Very truly yours,

//s//

Edward B. Wilkes, MS, CHP, RRPT

Certified Health Physicist, American Board of Health Physics (since November, 1996)

National Registry of Radiation Protection Technologists (since June, 1994)

From: "Wilkes, Edward B" <Edward.Wilkes@icp.doe.gov>
To: <SECY@nrc.gov>
Date: Mon, Jan 15, 2007 10:21 AM
Subject: PRM-35-20 Comment

Madam Secretary,

Please find in the attachment my comment on the petition for rulemaking filed by E. Russell Ritenour, Ph.D., on behalf of the American Association of Medical Physicists as published in the Federal Register Vol. 71 No. 211 on November 1, 2006. As a diplomate of the American Board of Health Physics, I support this petition for rulemaking; and urge the Commission to amend its regulations. Thank you.

Very truly yours,

Edward B. Wilkes, MS, CHP, RRPT

Certified Health Physicist, American Board of Health Physics (since November, 1996)

National Registry of Radiation Protection Technologists (since June, 1994)

Mail Envelope Properties (45AB9BD7.254 : 22 : 596)

Subject: PRM-35-20 Comment
Creation Date Mon, Jan 15, 2007 10:20 AM
From: "Wilkes, Edward B" <Edward.Wilkes@icp.doe.gov>
Created By: Edward.Wilkes@icp.doe.gov

Recipients

nrc.gov

TWGWPO02.HQGWDO01
SECY (SECY)

Post Office

TWGWPO02.HQGWDO01

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	647	Monday, January 15, 2007 10:20 AM
TEXT.htm	3283	
AAPM Petition Comment - E. B. Wilkes.doc	40448	
Mime.822	61993	

Options

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

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

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