

PRM-35-20
(71FR64168)

January 14, 2007
PRM-35-20 Public Comment

DOCKETED
USNRC

January 16, 2007 (4:00pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Sirs:

I became aware of this proposed document today by way of e-mail sent to me by former supervisor, James Bogard, a Certified Health Physicist (ABHP) at the Y-12 Plant in Oak Ridge, TN. I appreciated Mr. Bogard's exactitude and analytical comprehension, which he demonstrated both in routine operations and during drill procedures. I now agree with his concern that this new regulation will clutter the certification requirements for individuals who are already certified, and may force additional testing (via AAPM, etc) which may be inappropriate for a current or future Radiation Safety Officer.

It is significant to mention that I was certified by the ABHP (prior 2005), and also have taken the passed the requirements for certification by the American Association of Physicists in Medicine. Before 1982, when I went to the Y-12 Plant, I had experience with teletherapy planning, treatment and shielding design. Since my work at Y-12, I worked as a Certified Health Physicist in activities involving dosimetry, shielding, emergency planning, effluent measurement, and hand-held instrument technical specification for two different power companies in Pennsylvania. I have not been actively employed in fields of Health Physics or Radiation Protection, due to what was legally sustained as a metabolic brain injury. I have recently requested my membership in the American Society of Health Physics be routed to *emeritus* status. Despite experience I have had in the field of Health Physics, noted previously, I will not re-enter this area. I will enter another area of work soon, I hope, decidedly different from before. This resignation results not because I am incapable to pursue the previous assignments, but rather, because extraneous requirements, such as the proposed regulation, provide me little hope for necessary quality in future choices of Radiation Safety Officers, Supervisors or Managers. This regulation serves only a few elitists in the medical community, who have shown neither the general need nor the benefit of such requirements. Please understand my concern as expressed.

Yours truly,
Robert K. Barclay

Template = SECY-067

SECY-02

97

From: Carol Gallagher
To: SECY
Date: Tue, Jan 16, 2007 3:35 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 1/14/07.

The commenter's address is:

Robert K. Barclay
Jenny's Manor 4506 Werley's Corner Rd.
New Tripoli PA 18066

Carol

Mail Envelope Properties (45AD3717.255 : 5 : 35764)

Subject: Comment on PRM-35-20
Creation Date Tue, Jan 16, 2007 3:35 PM
From: Carol Gallagher

Created By: CAG@nrc.gov

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1795-0037.doc	22528	Tuesday, January 16, 2007 2:44 PM

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