PRM-35-20 (71FR64168)

Jan 16, 2006

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

Re: PRM-35-20

Dear Ms. Vietti-Cook:

DOCKETED USNRC

January 18, 2007 (8:30am)

OFFICE OF SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

Thank you for the opportunity to comment on the petition for rulemaking filed by E. Russell Ritenour, 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 diplomat 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." The new regulations require that individuals certified prior to October 25, 2005 by the ABHP be forced to use an alternate approval pathway. I see no evidence, however, that individuals certified prior to 2005 are any less capable of performing as a RSO.

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. I therefore believe that individuals considered qualified to be a RSO prior to October 25, 2005 by virtue of their board certification should continue to be considered qualified to hold this position.

As a certified health physicist (ABHP), I believe that I meet the training and education requirements needed to serve as an RSO at a medical institution. I therefore encourage the Commission to favorably consider the petition for rulemaking and modify 10 CFR 35 accordingly.

Sincerely,

Robert L. Coleman, CHP 118 Edgewood Drive Powell, TN 37849

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SELY-02

From:	Carol Gallagher	
То:	SECY	
Date:	Thu, Jan 18, 2007 9:58 AM	
Subject:	Re: Comment letter on PRM-35-20	

Van,

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Sorry! I've attached the correct file this time.

Carol

>>> SECY 01/17/2007 6:35:51 PM >>> Carol,

This email is blank.

Van

>>> Carol Gallagher 01/17/2007 3:14 PM >>> Attached for docketing is a comment letter on the above noted PRM that I received via the rulemaking website on 1/16/07.

Carol

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1795-0078.doc	36864	Wednesday, January 17, 2007 12:53 PM

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