

January 15, 2007

**PRM-35-20**  
**(71FR64168)**



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

DOCKETED  
USNRC

Re: PRM-35-20

January 17, 2007 (4:00pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear Ms. Vietti-Cook:

I am writing 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 recognized in 10 CFR Part 35 prior to October 25, 2005. As a diplomate of the American Board of Health Physics (ABHP), I support this petition for rulemaking.

The current regulations require that individuals certified prior to October 25, 2005 by the ABHP be forced to use the alternate pathway. I have, however, seen no evidence 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, and add complexity and expense to the regulatory process, without a corresponding increase in public or worker health and safety.

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.

In conclusion, I request 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.

Sincerely,

Howard Wallace, CHP

Template = SECY-067

SECY-02

**From:** Carol Gallagher  
**To:** SECY  
**Date:** Wed, Jan 17, 2007 11:14 AM  
**Subject:** Comment letter on PRM-35-20

Attached for docketing is a comment letter on the above noted PRM that I received via the rulemaking website on 1/15/07.

The commenter's address is:

Howard Wallace  
1913 Wilson Avenue  
Enumclaw WA 98022

Carol

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**Creation Date** Wed, Jan 17, 2007 11:14 AM  
**From:** Carol Gallagher

**Created By:** CAG@nrc.gov

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