

January 17, 2007

DOCKETED
USNRC

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

January 17, 2007 (4:00pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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.

As a diplomate of the American Board of Health Physics, I support this petition for rulemaking. I 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, 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 additional steps implied by the "alternative pathway" pose a burden upon individuals and licensees without a corresponding increase in public or worker health and safety. 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, 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.

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.

Sincerely,



Scott O. Schwahn, CHP

Template = SECY-067

SECY-02

From: Carol Gallagher
To: SECY
Date: Wed, Jan 17, 2007 3:48 PM
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 1/16/07.

The commenter's address is:

Scott O. Schwahn
1730 Satterfield Drive
Pocatello ID 83201

Carol

Mail Envelope Properties (45AE8B91.416 : 5 : 35764)

Subject: Comment letter on PRM-35-20
Creation Date Wed, Jan 17, 2007 3:48 PM
From: Carol Gallagher

Created By: CAG@nrc.gov

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MESSAGE	775	Wednesday, January 17, 2007 3:48 PM
TEXT.htm	560	
1795-0083.pdf	13981	Wednesday, January 17, 2007 3:29 PM

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
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Security: Standard

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