

PRM-35-20  
(71FR64168)

144

January 16, 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:

As a diplomate of the American Board of Health Physics, I support the referenced 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 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 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.

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.

Sincerely,

Allen Mabry, CHP

Templatz = SECY-067

SECY-02

**From:** Carol Gallagher  
**To:** SECY  
**Date:** Wed, Jan 17, 2007 3:53 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:

Allen M. Mabry  
713 Arjean Dr.  
Wilmington NC 28411

Carol

**Mail Envelope Properties** (45AE8CAB.416 : 5 : 35764)

**Subject:** Comment letter on PRM-35-20  
**Creation Date** Wed, Jan 17, 2007 3:52 PM  
**From:** Carol Gallagher

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

**Recipients**

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MESSAGE	766	Wednesday, January 17, 2007 3:52 PM
TEXT.htm	551	
1795-0087.doc	35328	Wednesday, January 17, 2007 3:33 PM

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