

EMPLOYEE SUGGESTION

INSTRUCTIONS: Prepare this form legibly (preferably typewritten) and submit 3 copies to your supervisor.

DATE RECEIVED

1. NAME OF SUGGESTER Edward M. Podolak, Jr.	2. POSITION TITLE Health Physicist	3. GRADE 14
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4. OFFICE - DIVISION - BRANCH - SECTION OSD-SHSS-RHSB	5. BUILDING   ROOM NO. NL   207	6. SUPERVISOR M.A. Parsons
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7. DESCRIBE THE PRESENT SITUATION, CONDITION, METHOD, ETC., WHICH YOU BELIEVE SHOULD BE CHANGED OR IMPROVED. (Continue on reverse if necessary)

My understanding of the present NRC enforcement system is that the licensee is faced with civil penalties and ultimately loss of a license. This enforcement system does not regularly reach down to the person who is actually responsible for the violation of the NRC regulations.

8. DESCRIBE YOUR SUGGESTION. (If you believe the suggestion will save manpower or material, improve methods, simplify work, prevent accidents, give specific details about the savings and improvements. Continue on reverse if necessary).

I suggest that NRC bolster its enforcement system by seeking legislative authority to prosecute for a felony the individual(s) who is(are) personally responsible for serious violations of NRC regulations. This is part of the enforcement system of the Food and Drug Administration and it works very well as a deterrent to individuals who contemplate violating FDA law. I recall that there was one case where everyone in a chain of command at a particular company was convicted of a felony, even though the president of the company was on a yacht in the Carribean at the time of the violation. The key to the FDA enforcement system is that the inspectors take great care to establish who has real authority and responsibility within a firm.

I believe that the threat to individuals of a felony conviction will improve compliance with NRC regulations and make people think twice before violating our regulations to "please the boss" or "please the company" or for personal gain.

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9. I hereby agree that the use of this suggestion by the United States shall not form the basis of a further claim of any nature upon the United States by me, my heirs, or assigns.

SIGNATURE OF SUGGESTER  
*Edward M. Podolak, Jr.*

DATE: 4/5/79

SIGNATURE OF COSUGGESTER (if any)

DATE:

ACKNOWLEDGMENT

THANK YOU FOR YOUR SUGGESTION. It will be carefully considered by those who have functional responsibility in the area of your suggestion, and you will be advised of the action taken. Your interest in improving NRC operations is appreciated.

SIGNATURE OF SUPERVISOR  
*M.A. Parsons*

DATE SUGGESTION RECEIVED 4/5/79	DATE OF ACKNOWLEDGMENT 4/5/79
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