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April 27, 1979

James Coughlin  
Vice President  
Nuclear

Mr. Samuel J. Chilk  
Secretary of The Commission  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555



Attention: Docketing & Service Branch

Gentlemen:

This is in response to the Federal Register Notice of February 28, 1979, regarding Mr. Anderson's petition for rulemaking involving NRC certification of Health Physics.

Public Service Company of Indiana, Inc. (PSI) has reviewed the proposed amendment to 10CFR20 filed by Mr. Victor Anderson. PSI encourages its personnel to seek professional advancement through whatever programs are available to them. Included among these would be the recently developed certification programs developed by the American Board of Health Physics; specifically, the certification for Power Reactor Health Physics Personnel and the certification of Health Physics Technicians. However, PSI does not support required certification for nuclear station personnel as outlined by Mr. Anderson for the following reasons:

1. The stated reason for Mr. Anderson's amendment is "to prevent management from placing pressure on Health Physics personnel to engage in bad practice." PSI is not aware of instances where station management pressure has exerted undue influence on a person's ability to express an opinion or recommendation or make a judgement. Furthermore if such were the case, there is no reason to believe that Mr. Anderson's certification requirements would necessarily relieve him from such management pressure. An obvious example of this is the NRC qualification requirements for Reactor Operators. Such personnel are not relieved of their responsibility to station management, just as management is not relieved of responsibility for the actions of its personnel.
2. Minimum qualification standards and guides are adequately described in the existing ANSI Standard 3.1-1978 and NRC Regulatory Guide 1.8 (Rev. 1). In part because of these documents, professional qualifications of nuclear station personnel are among the highest in industry.

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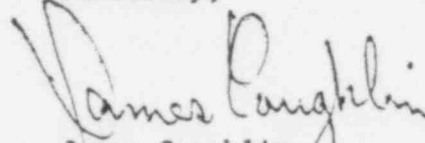
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3. Minimum qualifications of station personnel are supplemented by station-specific training programs at all nuclear power facilities. These training programs have been reviewed and approved by the NRC prior to their implementation. Furthermore, personnel who successfully complete this training are subject to detailed scrutiny in the NRC's I&E program. Therefore PSI seriously questions the added value that Mr. Anderson's amendment would have in achieving safer nuclear operations.

The proposed revision to Paragraph 20.600 seems to make the Health Physicists the final arbiter for licensee action, which is certainly inappropriate. Final responsibility for operational maneuvers, for instance, must rest with the duly licensed and trained operators. Health Physics personnel do not have appropriate training or experience to participate meaningfully in judgments involving station operation except as such operation has Health Physics aspects involved which may be only one of several factors to be considered.

Sincerely,

  
James Coughlin  
Vice President-Nuclear

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