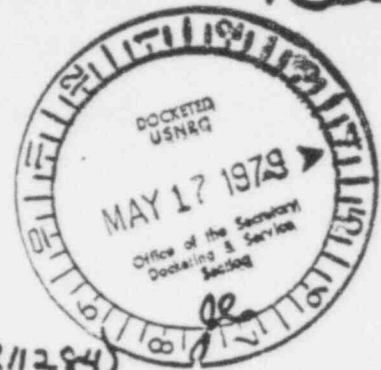


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T.C. NICHOLS, JR.
VICE PRESIDENT AND GROUP EXECUTIVE
POWER PRODUCTION AND SYSTEM OPERATIONS

April 27, 1979

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PETITION RULE PRM-20-13(4,FR11284)

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

Dear Mr. Chilk:

This letter is in response to the Victor E. Anderson filing of a petition for rulemaking to amend the regulation "Standards for Protection Against Radiation", 10CFR20.

After careful review and investigation of the petition, we do not agree with Mr. Anderson's proposed amendments to Part 20 for the following reasons:

1. The qualifications for health physics personnel have been identified in ANSI 18.1 standard and Regulatory Guide 1.8. These standards have been endorsed by the Nuclear Power Industry and Health Physics Task Force of the Edison Electric Institute.

The certification question is not a new one, this has been tossed about the industry for the last 3 or 4 years. Certification is not a foolproof method for qualification of health physics personnel. The present guides and standards provides a good mechanism of qualification by either on the job experience or certification. We agree that the present guidelines are more than adequate in meeting the goals of the industry and company management in the protection of plant personnel and the general public from radiation.

2. On going re-training programs are provided by the licensee to insure the health physics qualifications are maintained and in a continuing level of improvement of the plant health physics personnel.
3. Finally, the company management has committed in the FSAR and license to establish and maintain a policy program which will keep the radiation exposures to the plant personnel and general public as low as reasonably achievable (ALARA).

In conclusion, we feel the methods for health physics qualifications presently utilized in the nuclear power industry is more than adequate to provide the necessary guidance and protection against radiation of plant personnel and the general public.

Very truly yours,

T. C. Nichols, Jr.
T. C. Nichols, Jr. 309 172

TCNJR:pmw

cc: Mr. H. T. Babb
Mr. O. S. Bradham
Mr. M. C. Johnson

Acknowledged by card... 5/22..... ①
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