

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

500C Chestnut Street Tower II

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MAY 11 1979

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DOCKET NUMBER

PETITION RULE PRM -20-13(44FR 11284)



Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Sir:

In accordance with the February 28, 1979, Federal Register notice (44 FR 11284), the Tennessee Valley Authority (TVA) is pleased to provide comments on the petition for rulemaking by Victor E. Anderson, concerning health physics personnel.

Mr. Anderson's concern for the quality of services provided by health physics personnel is commendable. We believe the certification program proposed by Mr. Anderson is unwieldly. It inappropriately downgrades the need for formal education in favor of experience as judged by logging a certain number of hours in a licensed facility. Logging hours alone is not a guarantee of competence, but we recognize that both education and experience are important ingredients in the background of health physicists and health physics technicians. This combination is adequately addressed in NRC regulatory guides and ANSI standards that are now practiced by licensees. A certification program administered by the Nuclear Regulatory Commission (NRC) is not the only means available for achieving competent health physics support. At the present time, certification programs administered by the American Board of Health Physics and the National Registry of Radiation Protection Technologists are offered for professional health physicists and health physics technicians respectively. In addition, training programs offered by a licensee can be invaluable in ensuring high quality health physics support. TVA has established such a training program for health physics technicians that includes both classroom and on-the-job training. If evidence exists that certification should become mandatory, it should be administered through existing programs such as the American Board of Health Physics for health physicists and the National Registry of Radiation Protection Technologists for health physics technicians.

The licensee (the plant superintendent or his representative) does and must have the authority to override or reject the decisions and advice of the plant health physicist, as he is responsible for the overall safety of a nuclear power plant, the safety of the public, and conformance with the plant license. At the same time, the plant

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health physicist (since his job is to carry out an adequate radiation health and safety program that meshes with efficient power production) should have the authority to use formally recognized communication avenues to the licensee executive level should the health physicist believe that lower management has made a decision which will adversely affect radiation health and safety. We do not anticipate, nor have we ever experienced, a situation where plant management would willfully pressure a health physics person to engage in bad practices.

It would seem that understanding and respect for proper and effective health physics practices can be fostered among all plant organizations through education and knowledge of basic health physics. No health physics program can be successful without the cooperation and understanding of all plant personnel. Mr. Anderson's proposed amendment, 10 CFR Part 20.600, would not ensure that goal.

We believe the competence and viability of health physics support for which Mr. Anderson has concern can be provided by each licensee through existing regulatory requirements. Accordingly, the petition should be denied.

Very truly yours,

  
for J. E. Gilleland  
Assistant Manager of Power

cc: Executive Secretary  
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