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DOCKET NUMBER

444

May 2, 1979

PETITION RULE PRM - 20-13 (44FR11284)

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Docketing and Service Branch

SUBJECT: Proposed Amendment to 10 CFR 20, Regarding
Certification of Health Physics Personnel

Dear Mr. Chilk:

On February 27, 1979, the NRC published in the Federal Register a petition for rule making relating to the certification of Health Physics Personnel, and requested comments or suggestions concerning this petition. We appreciate the opportunity to provide the Commission with Philadelphia Electric Company's comments.

We are opposed to the certification of Health Physics personnel as proposed in this petition. The ability of Health Physics personnel to perform their function is dependent on their training and experience. Much of this training and experience is unique to the type of reactor and facility in which they work. Each licensee maintains a staff of qualified personnel which meets the requirements of ANSI 18.1. The qualifications of the staff as a whole, as well as individual Health Physicists, is reviewed by NRC inspectors as part of a routine inspection program. Our experience indicates that frequent NRC inspections, which include the review of records and the direct observation of personnel at work, adequately gauges the merits of any radiation protection program.

As a means to assist the NRC inspector in his review of personnel qualifications, we propose a licensee controlled type of certification. This type of certification could be based on a format used by the American Society for Nondestructive Testing as designated in their recommended practices No. SNT-TC-1A, June 1975 edition. This type of certification is nationally recognized and well understood in our industry. It could be implemented in a short period of time.

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The validity of this type of certification would be effective only as long as the individual was employed by the licensee.

We believe this type of certification would be much more meaningful than certification by outside agencies.

Very truly yours,

A handwritten signature in cursive script, appearing to read "H. A. ...".