

Bill



April 23, 1979

DOCKET NUMBER

29

PETITION RULE PRM-20-13(44FR11284)



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

Attention: Docketing and Service Branch

Dear Sirs:

In re: Docket No. PRM-20-13.

The filing of petition for rulemaking with regard to proposed amendments to 10 CFR Part 20 concerning required certification of Health Physicists appears to be directed toward nuclear reactor facilities. Yet the wording in the proposed Section 20.600 is directed to all individuals, partnerships, corporations, or other entities licensed.

As a representative of the Dow Corning Corporation, a chemical manufacturing firm, I wish to express my concern that the proposed legislation is excessive and unnecessary with regard to the Nuclear Regulatory Commission (NRC) licenses issued to the Dow Corning Corporation.

During application for a license, information is submitted per the application requirements. Information included in the applications (or in amendments to existing licenses) describes the qualifications of those individuals who have control of radiation sources and the radiation protection program. A review of individual's qualifications should be sufficient to determine if adequate expertise is available.

In addition to the mechanism that exists for checking qualifications at the time of license application or amendment, the NRC also has the mechanism to audit a license through the inspection process. Documentation and facilities review during an inspection should be able to provide assurance that a radiation safety program is being carried out adequately. I would expect these inspections to be thorough as Dow Corning was charged a fee for the last inspection.


Above all, to require certified Health Physicists to make all surveys, evaluations, and decisions on matters of radiation protection (especially in the context of chemical manufacturing firms), is strictly over-regulation. The problems generally encountered by most licenses I am familiar with in the chemical industry, are not of the complexity that requires the opinions of a certified professional to assure safety and compliance. Where will the numbers of certified Health Physicists come from that would be necessary to fulfill this regulatory obligation (for each licensee as well as the nuclear reactor facilities)?

Acknowledged by card... 5/

484 300
1

I would like to add that in no fashion does the management I work for now (Dow Corning Corporation) or the management I have worked for in the past (Dow Chemical Company) pressure Safety and Health personnel to engage in bad practice. Rather, they spell out that it is the responsibility of Safety and Health personnel to assure that bad practices do not exist.

Sincerely,



Mr. Paul R. Williams
Industrial Hygienist

baa