

GULF NUCLEAR, INC.

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March 5, 1979

Secretary of the Commission United States Nuclear Regulatory Commission Washington, D.C. 20555

SUBJECT: Docket No. PRM-20-13(44FR11284)
Victor E. Anderson

Dear Mr. Secretary:

"TO STANDARD DITTO I appreciate the opportunity to file an answer to the proposal for 10CFR 20.600 concerning certification for Health Physicists. In principle, I agree with Mr. Victor Anderson. However, I can see where there would be a great number of problems in attempting to implement such a program. Example: There is a large gap or difference in say, a one man radiography operation and a Nuclear Power Plant, and yet in both cases a survey is required. The overall certification idea is good; it just seems that there would have to be minimums set for so many varieties of positions that it would be difficult.

You further could conceive of a problem when the small company might have only one Health Physicist and he might for some reason or another not show up for work one day, and according to this request, the company would be shut down for lack of someone to run a survey.

I do feel that the idea is a very good one and that some type of open discussion should be held by the commission to try to formulate a workable plan. I further feel that it should be expanded to include not only Health Physicists but also include Radiation Safety Officers.

Very truly yours,

Walter P. Peeples, Jr.

President

WPP/dfc

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Acknowledged by card.