

# GENERAL ELECTRIC

GENERAL ELECTRIC COMPANY, P.O. BOX 460, PLEASANTON, CALIFORNIA 94566

NUCLEAR ENERGY  
ENGINEERING  
DIVISION

NRC PUBLIC DOCUMENT ROOM

April 30, 1979



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

Attention: Docketing and Service Branch

40

Reference: Docket No. PRM 20-13 (44FR11284)

The Nuclear Energy Business Group of the General Electric Company has reviewed the Petition for Rulemaking by Victor E. Anderson which would require that health physics personnel be certified by the Commission (Ref.). Accordingly, we wish to offer the following comments:

1. Mr. Anderson may be unaware that the Health Physics Society has already established a certification program for Health Physicists under the aegis of the American Board of Health Physics. There is also a National Registry of Radiation Protection Technologists which lists technologists who have demonstrated their knowledge and ability by passing written examinations in Radiation Protection Technology. As certification programs exist for both Health Physicists and Radiation Protection Technologists, no further certification program by the Commission is necessary.
2. The petitioner's proposed rules raise serious management questions. The Commission's regulations clearly place responsibility for radiation safety on the licensee. This can only mean that the management of a facility must ultimately bear this responsibility. To introduce an individual whose decisions cannot be overridden by management but who is not responsible for the consequences

343 227

Acknowledged by card. 5/22

7007190.273

Secretary of the Commission  
U.S. Nuclear Regulatory Commission

-2-

April 19, 1979

of those decisions is therefore inconsistent and contrary to good management practices.

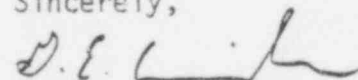
In addition, it has been the Commission's practice to require licensees to have health physics responsibilities in a group which does not report directly to operating management or to have independent radiation safety committees. We believe that this approach adequately frees health physics personnel from management pressures which could result in "bad practices". Therefore, we do not believe that the proposed Section 20.600 is necessary.

3. We do not believe that the radiation safety record of the industry supports Mr. Anderson's assertion of widespread management pressure on health physics personnel. We note that the Commission provides an opportunity for any employee to report practices he believes to be questionable to the Commission without his identity being revealed. This, in conjunction with the Commission's extensive program of inspection and enforcement, precludes any need for the petitioner's proposed regulations.
4. By requiring that certified individuals make all surveys, evaluations, and decisions on matters of radiation safety, the proposed rules may require an additional employee to be stationed at job sites. This additional employee will, of course, be exposed to radiation. This is not consistent with the Commission's position on ALARA.

For the above reasons, we believe that Mr. Anderson's petition should not be adopted.

We appreciate this opportunity to submit our comments.

Sincerely,



G.E. Cunningham  
Sr. Licensing Engineer

vcc

343 228