

**CP&L**

**Carolina Power & Light Company**

P. O. Box 1551 • Raleigh, N. C. 27602

DOCKET NUMBER

36

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

J. A. JONES  
Executive Vice President  
Chief Operating Officer

May 3, 1979

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

ATTENTION: DOCKETING AND SERVICE BRANCH



Dear Mr. Chilk:

Carolina Power & Light Company wishes to comment on the petition for rulemaking by Mr. Victor E. Anderson noticed in the Federal Register on February 28, 1979, to require that health physics personnel be certified by the Commission. The Company considers the health physics personnel at our licensed nuclear generating plants to be an integral part of the plant staff. Sufficient NRC guidance in Regulatory Guide 1.8, "Personnel Selection and Training," Revision 1, and ANSI Standard 18.1 is provided to utility management to assure that qualified personnel are selected for the nuclear plants.

Carolina Power & Light Company strongly disagrees with the petitioner and concludes that no formal certification of health physics personnel by the Commission is warranted. Compliance with the above-mentioned regulatory guidance and national standard will assure the necessary experience and expertise required for health physics personnel. The additional administrative efforts with their associated costs to administer such a certification program is not justified. Company management fully supports the health physics programs and the professional health physics personnel administering and carrying out the programs. Plant management expects the health physics personnel to conduct health physics programs which are in full compliance with Federal regulations and to inform plant management of any condition which might lead to a violation of applicable regulations.

In summary the present standards and NRC regulatory guidance are sufficient to ensure that proper selection and training of health physics personnel is accomplished. Company management fully supports the health physics personnel in their efforts to conduct health physics programs in compliance with applicable regulations.

Yours very truly,

*J. A. Jones*  
J. A. Jones

JAJ/tlc

Acknowledged by card... 5/22

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