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(31)

PETITION NUMBER
PETITION RULE PRM-20-13(44FR11284)



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

Attention: Docketing and Service Branch

Gentlemen:

Subject: Docket Number PRM-20-13

This letter is in response to the petition for rule making filed by Mr. Victor E. Anderson which was published in the Federal Register, Volume 44, No. 41 - Wednesday, February 28, 1979. (Docket No. PRM-20-13)

In the Petition, it appears that Mr. Anderson has used his personal experiences while working as a health physics technician as justification for an NRC certification program. From these, he makes blanket statements indicating his experiences represent industry practice. Mr. Anderson also indicates that the primary reason for suggesting an amendment to 10 CFR Part 20 is to prevent management from placing pressure on health physics personnel to engage in bad practice. Again, it appears that Mr. Anderson is using his personal experiences as representative of industry practice. His experiences certainly do not represent my own, nor do I believe they represent the vast majority of those persons engaged in health physics activities. I base this conclusion on my 20 years of experience in the field and my association with other health physicists in the Health Physics Society where I have served on many committees and am currently a member of the Board of Directors.

The Petition implies that the NRC is not presently evaluating the qualification of health physicists or radiation safety officers. This is not the situation. General qualifications for these people are contained in various sections of 10 CFR and in a number of NRC Regulatory Guides. Before licenses are granted, the NRC staff thoroughly reviews the qualifications of the applicant's radiation safety officer. After a license is issued, representatives of the NRC regularly inspect licensee facilities and evaluate the performance of the licensee's staff. A certification program as proposed in the Petition would appear to be redundant to existing NRC activities.

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With respect to certification itself, there are a number of professional boards which now certify individuals in the radiation protection field. Among these are the American Board of Health Physics, the National Registry of Radiation Protection Technologists, and the American Board of Industrial Hygiene. Other boards exist which are associated with the practice of medicine. These boards are nationally recognized and have high standards. If certification of health physicists is necessary, it is in the best interest of the public that the independent professional boards be utilized. They not only certify those individuals in the industrial, academic, and medical communities, but also those in regulatory agencies, where competency is equally important. Mr. Anderson's petition would be limited only to those persons falling under 10 CFR Part 20, and would not apply to NRC contractor health physicists or those who are members of a state or federal regulatory agency.

In summary, I urge you to deny the Petition for the following reasons:

1. The petitioner has expressed a need for the amendment based on his personal experiences which do not represent standard practice in industry.
2. The NRC already evaluates the qualifications of persons responsible for licensee radiation safety programs.
3. Independent nationally recognized certification boards already exist for determining the competency of health physicists and health physics technicians.

Sincerely,


Robert G. Wissink
Certified Health Physicist

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