

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET  
SACRAMENTO, CA 95814  
(916) 445-0931



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DOCKET NUMBER

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

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
1717 H Street Northwest  
Washington, D.C. 20555

Attention: Docketing Service Branch

Subject: Petition No. 7590-01-M, Docket No. PRM-20-13 of  
Victor E. Anderson, dated January 17, 1979



Sir:

Since 1960, the sole certifying body for professional health physicists has been the American Board of Health Physics, an independent body of health physicists incorporated in the United States with the objective of maintaining professional competence. Therefore, the term "Certified Health Physicist" has meaning only as applied to a professional health physicist who has qualified for and met the educational and experience standards set by the American Board of Health Physics and, further, been certified by the Board after having successfully passed rigorous examination of said Board, with continued education a necessary requirement for recertification each five years.

Adoption of such an amendment would tend to reduce the number of persons enabled to perform such activities, since in practice a large percentage of routine and specialized work is performed by para-professionals under supervision of experienced health physicists. Indeed many minor radiation protection surveys are, and may be, done by individuals who do so only as part of their duties.

Petitioner's proposed reasons to validate a federally sponsored and regulated program is fully unnecessary. The safe use of radioactive materials is adequately controlled by federal regulations, by the U.S. NRC and other appropriate agencies, and by the agreement states, all of whom have regulations at least as binding as the federal regulations, and in some agreement states, more so. Thus, the public interest is adequately protected and no need exists for the proposed rulemaking.

Furthermore, it is not clear how the amendment in the form stated would accomplish its stated objective, "To prevent management from placing pressure on health physics personnel to engage in bad practice".

Sincerely,

*J.O. Ward*  
J.O. Ward, Chief  
Radiologic Health Section

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Acknowledged by card... *6/11/79*

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