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

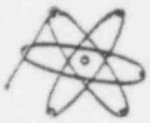
Dear Sir

We agree wholeheartedly with the intent of the proposed amendment to 10CFR20, 20.600. Having had nine years combined health physics experience with commercial nuclear power, and fifteen years total experience, covering sixteen different licensees, we have experienced the same management pressure that led Mr. Anderson to make his proposal. Certain plants have repeatedly violated good health physics practices, with the intent of "getting the job done". Hopefully the NRC will do the certification with annual, or biannual retesting, emphasizing practical techniques generic to the type of facility, not just written examinations, as is done with operators.

In the event of a disagreement between two senior or higher health physicist, the matter should be referred to a higher level certified health physicist. If two master health physicist disagree, the matter should be referred to the regional NRC office for resolution.

All contracted health physics groups shall have at least one master health physicist, in order to prevent licensees from havin their Master health physicist dictate bad practices due to management pressure.

This amendment(regulation) should be mandatory, with no grandfather clause permitted, as there are far too many health physicist now in the industry who are incompetent.



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

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