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1105 South Fork Drive  
River Falls, Wisconsin 54022  
May 18, 1979



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

Attention: Docketing and Service Branch

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Gentlemen:

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

This letter is in response to Mr. Victor E. Anderson's petition for rule making filed with the Commission as published in Volume 44, 1 of the Federal Register (Wednesday, February 28, 1979).

It appears that Mr. Anderson has based his justification for an NRC Certification Program for Health Physicists on personal experiences which I do not feel are representative of industrial health physics programs. His experiences certainly do not represent my own, nor do I believe they represent the vast majority of those persons engaged in industrial health physics programs. In my fifteen years as a practicing Health Physicist, I do not ever recall being pressured by management to engage in bad health physics practices. I have certainly had to provide proper justification to management for health physics program implementation and revision that I have recommended to them. However, I don't consider this to be undue management pressure. Through use of sound professional judgement I have been able to properly justify my recommended programs and management has responded accordingly.

Mr. Anderson's petition appears to imply that the U. S. NRC is not presently evaluating the qualifications of Health Physicists. I do not believe this represents the true situation. Before granting licenses, the NRC staff thoroughly reviews the qualifications of the applicant's radiation safety officer and the radiation safety program. In addition, after a license is issued, members of the NRC regularly inspect licensee facilities to evaluate the performance of the licensee's staff. The certification program as proposed in Mr. Anderson's petition therefore appears to me to be redundant.

Implementation of a Health Physics Certification Program by the U.S. NRC is unnecessary. A number of nationally recognized professional boards, such as the American Board of Health Physics, the National Registry of Radiation Protection Technologists and boards associated with the practice of medicine already exist. These boards have high standards and are presently conducting effective health physics certification programs.

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If Health Physics Certification is to be required of health physicists engaged in industrial health physics programs, it appears that it is in the best interest of the public that these independent professional boards be utilized. They certify individuals in the industrial, as well as the academic, medical, and regulatory agency communities where competency is equally important.

I urge the Commission to deny Mr. Anderson's petition for the following reasons:

1. I do not believe that the petitioner's experience is representative of industrial health physics programs.
2. The NRC continuously evaluates the qualifications of persons responsible for licensee radiation safety programs.
3. Nationally recognized professional certification boards already exist for determining the competency of Health Physicists.

Sincerely,

*Duane C. Hall*

Duane C. Hall  
Certified Health Physicist

DCH: jls

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