

International Brotherhood  
of Electrical Workers

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DOCKET NUMBER

PETITION RULE PRM-20-13 (44FR11284)

1125-15th St. N.W.  
Washington, D.C.  
20005

April 9, 1979

Mr. Samuel J. Chilk  
Secretary of the Commission  
US Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

This is in response to a petition for rulemaking (Docket PRM-20-13) which appeared in the Federal Register, Vol. 44, No. 41, Wednesday, February 28, 1979.

The IBEW is an organized labor union of over one million members who work throughout the electrical industry.

Including Shippingport and Hanford-N there are 72 power reactors licensed to operate. These 72 units are located at 50 stations. The IBEW represents the bargaining unit at 33 out of the fifty stations.

Our current annual survey shows that about 6,000 members are permanently assigned to the various nuclear power stations: they are mechanics, they hold senior and operator licenses as reactor operators, I & C techs, storeroom personnel, administrative personnel and rad techs. Over 500 of our members are rad techs. Most IBEW members who are nuclear workers are at power reactors.

The IBEW does not oppose the certification of health physics personnel. We have had conversation with NRC staff on this subject. The IBEW, however, does not agree with the petition under review because of statements made in the cover letter accompanying the petition and the petition itself.

Item 1 of the cover letter refers to that section of the labor agreement called "management rights". That management has the right to run the business, the IBEW does not disagree. In those cases where management "pressures" our members, if a violation of the labor agreement (a condition) occurs, remedy (grievance procedure) under the labor agreement is provided. Item 1 is "pie in the sky" type reasoning where an individual can make a decision free of responsibility.

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Item 2 is not an absurd concept for the IBEW. Most of our members in health physics have the word technician as part of their title. The word technician to the IBEW is an extension in technological fields of what the word journeyman is in the trades. We are craftsmen who have mastered our crafts and are not ashamed to be called journeymen or technicians.

The most serious disagreement that the IBEW has with the petitioner is in the petition itself. The IBEW does not believe that it should be the function of the NRC to certify health physics technicians. The IBEW believes that the certification of health physics technicians should be by a professional group in the private sector. Such groups exist. The IBEW is a strong supporter of private sector enterprise.

10CFR20 applies to all licensees most of whom do not operate power reactors. Most IBEW members who are radiation workers, work for employers who are licensees of power reactors. The IBEW questions the change to Part 20 for all licensees when the petitioner identifies his experience as being at power reactors. Power reactors have unique problems which are not necessarily representative of all licensees.

The IBEW recommends that the petition for rulemaking (Docket PRM 20-13) be denied.

Very truly yours,

Paul R. Shoop  
International Representative  
Utility Department

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