

DOCKET NUMBER

PETITION RULE PRM -

TO: Secretary, U.S. Nuclear  
Regulatory Commission  
Washington, D.C. 20555

ATTN: Chief Docketing and Service Section

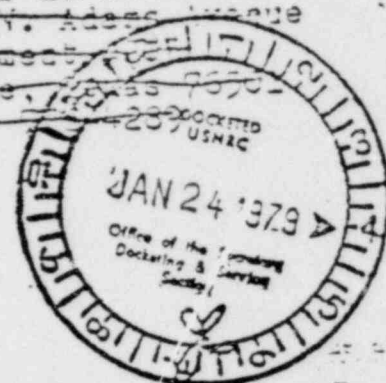
Dear Sir:

Enclosed is my petition requiring that Health Physics personnel be certified by the commission. It is not my concern that the exact words of the petition be adopted. What I do feel is necessary is that the following points be established:

- 1) That Health Physics personnel be free from management pressure in decisions on matters of Radiation Protection (Amendment 20.600).
- 2) That the concept of a Health Physics Technician is an absurd concept. The individual performing in a health physics capacity in such areas as job coverage, surveys, evaluations and decisions is in fact performing as a health physicist. In my work as a free-lance rental "H.P. Tech" I am required to maintain knowledge equal to or in some cases better than most "Health Physicists". The individual on the floor must be able to make decisions based on a sound knowledge of Health Physics. When a problem occurs (such as a dropped fuel bundle or a massive resin spill), this is not the time for a half trained tech who knows only station procedures to be calling management for advice.
- 3) In reference to point 2. Karl Z. Morgan (regarded as the founder of Health Physics) defined a health physicist as a person engaged in the study and practice of radiation. The commission must provide a means of verifying the individuals qualifications. A certification program will do this.
- 4) Academic degrees are not a guarantee of competence. I have known many fine Health Physicists who have had no formal training. It does take these individuals more time to acquire the same level of knowledge that a formally trained person has. What they have is maturity in the field. Maturity can not be bought or established by any numbers of years of schooling. It can only be won through experience. What the commission must recognize is that competence in the field of Health Physics, however it is acquired, is valid.
- 5) There will be various levels of competence based on experience and knowledge.

If the above points are taken into consideration, an outstanding certification program can be formed. Health Physics is one of the three most important job functions performed in a facility. Operations and maintenance are important for obvious reasons. Because of the nature of radioactive materials there must be a group of individuals who are concerned with radiation safety. These persons must be familiar with all phases of the facilities operation, maintenance and above all have demonstrated a sound understanding of Health Physics. This is the ideal, unfortunately in the industry this is not true. Furthermore there are no official legal standards, only a regulatory guide for radiation protection

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managers and some ANSI Standards for Techs. As a result the quality of Health Physics personnell is very uneven and many incompetent individuals (especially Radiation Protection Managers) are presently working in the field. A certification program will cure this problem and assure the public and the workers of adequate radiation protection.

The primary reason for suggesting that ammendment 10 CFR 20.600 be added is to prevent management from placing pressure on Health Physics personnel to engage in bad practice. This does occur. Just ask any H.P. what happens when he holds up a critical path job for radiation protection reasons or tries to ask a doctor to follow good health physics practice. Addition of section 10 CFR 20.604 would prevent abuse of the powers granted under section 20.600.

Thank you for taking the time to consider this petition. Please feel free to call or write to my home address if you have any questions.

Thank you,

*Victor E. Anderson*  
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jaa/VEA