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TO:

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

ATTN:

Chief Docketing & Service Section

I, Victor E. Anderson, petition the U.S. N.R.C. to amend title 10 chapter 1 part 20 Code of Federal Regulations in the following manner:

Add to section 20.3 the following definitions.

20.3 a, 19 Health Physicist- any individual engaged in the practice and study of radiation protection.

20.3 a, 20 Certified Health Physicist - An individual who has been certified by the Commission to provide advice and consent on matters of Radiation Protection to Licensee's.

20.3 a, 21 Health Physics Certificate - A certificate issued under this regulation to individuals as specified in 20.600 thru 20.607.

Add sections 20.600 to 20.607

20.600 only individuals certified by the Commission may make surveys, evaluations and decisions on matters of Radiation Protection. This does not preclude individuals from taking actions for their own protection. A licensee may not override the decisions of a certified Health Physicist except in cases where the Health Physicist decision(s) are a clear violation of Federal Regulations or will result in a clear and present danger of loss of life.

20.601 Health Physicists shall be certified on the following levels - Trainee, Junior, Senior, Supervisor and Master Health Physicists.

20.602 Trainee Health Physicist. A Trainee shall be an individual training to obtain a Health Physics Certificate. Each Trainee shall possess a NRC Form 4 and be instructed in matters of radiation protection. This individual will train directly under a Certified Health Physicist. He will only make surveys, evaluations, and decisions under the direct supervision of a Certified Health Physicist. No test will be required for a trainee.

20.603 A Junior Health Physicist Certificate will be issued to an individual who has passed the appropriate test as administered by the commission. The individual will have worked at least six (6) months as a trainee in a facility where licensed materials are handled. An individual who possesses a Doctorate of Philosophy in Health Physics may test directly to the level of Junior Health Physicist without any on the job experience. A Junior Health Physicist may make routine surveys and evaluations. This individual may provide advice on matters of radiation protection. He may make decisions, non-routine surveys and evaluations under direct supervision of a higher Certified Health Physicist.

20.604 a - Senior Health Physics Certificate. This Certificate will be issued to an individual who has passed the appropriate test. The individual will have worked at least two (2) years as a Junior Health Physicist or logged 4160 hours work in a licensed facility. Individuals who hold formal degrees in Health Physics or who have graduated from a school offering instruction in Health Physics will be allowed to advance according to the following table.

DEGREE	TIME
A.S.	18 Months or 3120 hours
B.S.	12 Months or 2080 hours
M.S.	6 Months or 1040 hours
Ph.D	6 Months or 1040 hours
Others	As determined by the Commission

20.604 b - Senior Health Physicist is the primary person responsible for providing advice and consent on matters of radiation protection. This individual provides direct on the job coverage, surveys, evaluations, decisions and worker supervision in matters of radiation safety. The Senior Health Physicist must be able to work with minimal supervision.

20.605 a Supervisor Health Physics Certificate. This certificate will be issued to an individual who has passed the appropriate test. The individual must have at least three (3) years or logged 6240 hours experience working as a Senior Health Physicist. Individuals possessing a Doctorate in Health Physics may test to the Supervisor level within two (2) years or after 4160 hours experience as a senior Health Physicist.

20.605 b - These individuals will normally fill the position of Radiation Protection Manager, they will be responsible for the appropriate Radiation Protection Programs for a facility, providing supervision to the Health Physicists under them and providing advice and consent on all matters of Radiation Safety to the facilities management.

20.606 Master Health Physics Certificate. This certificate will be issued to an individual who has passed the appropriate test. This individual will have worked at least fifteen (15) years as a Health Physicist. A Master Health Physicist shall be an individual who has demonstrated a complete mastery of the field of Health Physics.

20.607 Certification and Validation of Certificates.

a - Each certificate (except that of trainee level) shall be valid for a period of five (5) years. Trainee certificates shall be valid for eight (8) months.

b - Upon or before expiration of the certificate the individual must retest. The individual failing the test will be given a three (3) month grace period to retest. Failure to pass will result in the loss of certification. The individual may be given a lower certificate at the commission's discretion.

c. - The Commission shall issue study guides for the various levels of tests. Each study guide shall outline areas of studies and references. These areas of study will correspond to the various subjects in the appropriate test.

20.607 continued

d - An individuals certificate may be revoked if he fails to provide adequate advice and consent on matters of radiation safety. Persons may submit reports to the commission or its inspectors as pertains to a certified health physicist's failure to provide adequate advice and consent on matters of radiation protection. The commission before revoking an individuals certificate must hold a hearing with the individual present and allowed to present matters in their own defense. Individuals may appeal adverse decisions to the commissioner.

e - Upon issuance of these amendments to the regulations individuals who are presently working in the field of Radiation Protection will have one (1) year to test to their appropriate level of certification. In determining what level an individual may certify, the criteria for time spent working the field as outlined in sections 20.600 thru 20.606 shall be used. Individuals may test for lower level certificates than they are qualified for.

Vito E. Anderson
Jan 17, 1979