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FRANK H. HENDRICKSON, M.D., CHAIRMAN

June 30, 1982

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

DOCKET NUMBER  
PROPOSED RULE

PR-Misc Notice  
Reg Guide



Attn: Docketing Service Branch

RE: Qualification for Radiation Safety Officer

In April 1982, your commission published a Regulatory Guide and Value/Impact Statement regarding the qualifications for a Radiation Safety Officer in a large scale non-fuel-cycle radionuclide program. Members of my organization noted in it that your suggested training requirements for the position made mention of various levels of degrees in Health Physics or Radiological Health, or certification by the American Board of Health Physics as being adequate when combined with two to four years of applied experience. Our membership agrees that these recommendations are appropriate, however, we feel that your omission of the great numbers of persons trained in Radiological Physics who are currently serving as Radiation Safety Officers and consultants to radionuclide programs should be corrected.

Our members are trained in the application of radiation and radioactive materials in health care and in industry, obtaining the same range of degrees as mentioned in the April publication. With adequate experience, and after passing both written and oral exams, we are eligible for certification by the American Board of Radiology. Nationally, our membership numbers almost 2000. In many institutions, the Radiological Physicist serves as the sole source of expertise with regard to radiation safety matters and licensing. This is in addition to assisting the physician in the application of radiation therapy and assuring image quality in diagnostic radiology and nuclear medicine.

On behalf of our Association and USNRC License No. 12-00929-13, by whom I am engaged as a Radiological Physicist, I would like to request that the suggested required qualification listed in Table I of the publication be amended to the following:

Table I

COMBINATIONS OF TRAINING AND EXPERIENCE FOR A RADIATION SAFETY OFFICER

| Formal Education and Certification                             | Experience   |
|--|--|
| A. Bachelor's degree in health physics or radiological health. | A. Four years of applied health health physice experience in a program with radiation safety problems similar to those in the program to be managed. |

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PDR REGGD  
08. XXX C PDR

Acknowledged

6/25/82.mdv

2509  
Add: Ed Hill  
5650 NL

Table I

COMBINATIONS OF TRAINING AND EXPERIENCE FOR A RADIATION SAFETY OFFICER

| Formal Education and Certification   | Experience   |
|--|--|
| B. Bachelor's degree in a physical science or a biological science with a physical science minor, and one year of graduate work in health physics. | B. Same as above.  |
| C. Master's degree in health physics, radiological health, or <u>radiological physics</u> .  | C. Three years of applied health physics experience in a program with radiation safety problems similar to those in the program to be managed. |
| D. Doctor's degree in health physics, radiological health, or <u>radiological physics</u> .  | D. Two years of applied health physics experience in a program with radiation safety problems similar to those in the program to be managed.   |
| E. Comprehensive certification by the American Board of Health Physics or <u>the American Board of Radiology</u> .                                 | E. Same as above.  |

(underlining above) indicates our suggested revisions in the above Table.

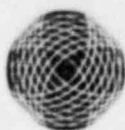
Sincerely,

*Lawrence H. Lanzl*

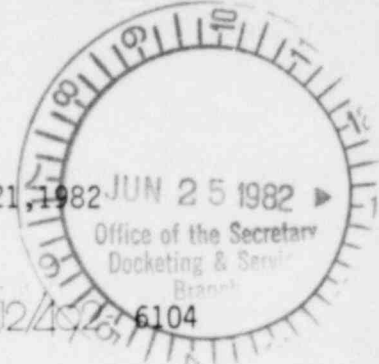
Lawrence H. Lanzl, Ph.D.  
Professor of Medical Physics

(Past member of the American Board of Health Physics)  
(Present member of the Physics Examination Committee  
of the American Board of Radiology)

Certified by ABAP & ABR,



June 21, 1982 JUN 25 1982



saint francis hospital 355 ridge avenue evanston, illinois 60202 312/452-6104

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

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On behalf of our Association and USNRC License No. 12-00963-02, USNRC License No. 12-00963-03, and USNRC License No. SNM 1426, by whom I am engaged as a Radiological Physicist, I would like to request that the suggested required qualifications listed in Table I of the publication be amended to the following:

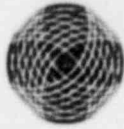
TABLE I

COMBINATIONS OF TRAINING AND EXPERIENCE FOR A RADIATION SAFETY OFFICER

| Formal Education and Certification                             | Experience  |
|--|---|
| A. Bachelor's degree in health physics or radiological health. | A. Four years of applied health physics experience in a program with radiation safety problems similar to those in the program to be managed. |

D509  
Add: Ed Hill  
5650 NL

Acknowledged by card 6/25/82 mdv



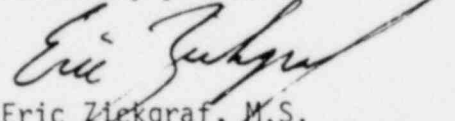
saint francis hospital 355 ridge avenue evanston illinois 60202 312/492-

TABLE I

| Formal Education and Certification   | Experience   |
|--|--|
| B. Bachelor's degree in a physical science or a biological science with a physical science minor, and one year of graduate work in health physics. | B. Same as above.  |
| C. Master's degree in health physics, radiological health, or <u>radiological physics</u> , or <u>medical physics</u> .                            | C. Three years of applied health physics experience in a program with radiation safety problems similar to those in the program to be managed. |
| D. Doctor's degree in health physics radiological health, or <u>radiological physics</u> , or <u>medical physics</u> .                             | D. Two years of applied health physics in a program with radiation safety problems similar to those in the program to be managed.              |
| E. Comprehensive certification by the American Board of Health Physics or the <u>American Board of Radiology</u> .                                 | E. Same as above.  |

(underlining above) indicates our suggested revisions in the above Table.

Sincerely yours,

  
Eric Ziekgraf, M.S.  
Radiological Physicist