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OFFICE OF SECRETARY  
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AT YOUR FACILITIES

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ISOTOPE MEASUREMENTS LABORATORIES, INC.

August 17, 1982

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

PROJECT NUMBER  
PROPOSED RULE *PR - Misc. Notice  
(Reg Guide)*

Attention: Docketing Service Branch

Reference: Qualification of Radiation Safety Officer

Gentlemen:

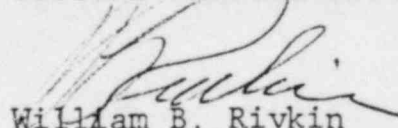
In April 1982, your Commission published a Regulatory Guide and Value/Impact Statement regarding the qualifications for a Radiation Safety Officer. One of your combinations of training and experience for a Radiation Safety Officer includes a Bachelor's degree in health physics or radiological health with associated four years of health physics experience in a program with radiation safety problems, similar to those in the program to be managed.

It appears to us that an individual with a Bachelor's degree in any of the physical sciences, and significantly more than four years of applied health physics experience (*i.e.* ten years of health physics experience) should qualify an individual to administer a large scale non-fuel-cycle radionuclide program.

On behalf of U.S. Nuclear Regulatory Commission License No. 12-13568-01 and 12-09160-01, I would like to request that the suggested required qualifications be amended as noted.

Very truly yours,

ISOTOPE MEASUREMENTS LABORATORIES, INC.

  
William B. Rivkin  
General Manager

WBR:sk

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*8/25/82 emp*