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COMMUNITY SAFETY DEPARTMENT  
OFFICE OF RESEARCH & OCCUPATIONAL SAFETY  
LOS ANGELES, CALIFORNIA 90024

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J.M. Bell  
U.S. Nuclear Regulatory Commission  
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Dear Jack:

Sorry I've taken so long to comment on your draft guide on "Qualifications for the Radiation Safety Officer In A Large-Scale Non-Fuel-Cycle Radionuclide Program". It has been a really busy summer and unfortunately the draft got buried under a large stack of other work.

In general, I think you have done an excellent job on the draft and I have no major concerns or comments. It seems to me that the real key to the effectiveness of the RSO in a large program is outlined by the last paragraph on page 7 and the first two paragraphs on page 8. (These statements are more important than the actual levels of training and experience described in Table 1.) Perhaps you could emphasize these three crucial paragraphs by putting them in a separate section, rather than as part of the "Discussion" section. Also, I would change the two "shoulds" in the second paragraph on page 8 to "must".

Thanks for the chance to have had some input in the development of this guide, we need to encourage more such early discussions between the users (regulatees) and the NRC (regulators).

Very Truly Yours,

*Walt*

Walter F. Wegst  
Director, Research &  
Occupational Safety

8212020131 821109  
PDR REGGD  
08. XXX C PDR

WFW/gr

*DS09  
add: Ed Hill  
#136 SS*