



Omaha Public Power District  
444 South 16th Street Mall  
Omaha NE 68102-2247

April 8, 1996  
LIC-96-0043

DOCKETED  
USNRC

'96 APR 12 P3:28

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary, U. S. Nuclear Regulatory Commission  
Attn: Docketing and Services Branch  
Washington, D.C. 20555-0001

DOCKET NUMBER  
PETITION RULE PRM 35-13  
(61FR4754)

⑪

- References: 1. Docket No. 50-285  
2. Federal Register Volume 61, No. 27, dated February 8, 1996  
(61 FR 4754)

**Subject: Comments on Proposed Rule Regarding National Registry of Radiation Protection Technologist Registration**

The Omaha Public Power District (OPPD) has reviewed Reference 2 regarding the proposed rule change to include acceptance of the National Registry of Radiation Protection Technologist (NRRPT) registration as fulfilling some of the training requirements for a Radiation Safety Officer (RSO). Specifically, the rule change requests that the NRC accept NRRPT registration for the current requirement of 200 hours of classroom and laboratory training, as specified in 10 CFR 35.900(b)(1), and for nine months of the current one-year experience requirement specified in 10 CFR 35.900(b)(2).

OPPD agrees with the proposed rule change to 10 CFR 35.900(b)(1) that would accept NRRPT registration for the current 200-hour classroom and laboratory training requirement. OPPD agrees that an applicant which meets the NRRPT registration requirements and successfully passes the comprehensive multiple-choice examination has equivalent training to the current 200 hours of classroom and laboratory training. The subject categories of the NRRPT examination are equivalent to those stated in 10 CFR 35.900(b)(1).

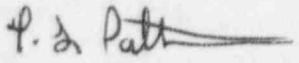
However, OPPD does not agree with the proposed rule change to 10 CFR 35.900(b)(2). OPPD does not agree that the experience requirements for NRRPT certification equate to nine months of full-time experience as a radiation safety technologist or as a radiation safety specialist at a medical institution, under the supervision of the RSO. OPPD does agree with expanding the definition to allow time as a radiation safety technologist or time as a radiation safety specialist to apply, if under the supervision of the RSO at a medical institution. However, OPPD recommends that the experience requirement in 10 CFR 35.900(b)(2) remain at one year.

9604150147 960408  
PDR PRM  
35-13 PDR

Secretary, U. S. Nuclear Regulatory Commission  
LIC-96-0043  
Page 2

If you should have any questions regarding OPPD's comments on this proposed rule change affecting NRRPT registration, please contact me.

Sincerely,

  
T. L. Patterson  
Division Manager  
Nuclear Operations

TLP/d11

c: Winston & Strawn  
L. J. Callan, NRC Regional Administrator, Region IV  
L. R. Wharton, NRC Project Manager  
W. C. Walker, NRC Senior Resident Inspector  
Document Control Desk