



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

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May 2, 1985

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

ATTN: Docketing and Service Branch

Dear Sir:



Thank you for the opportunity to comment on the Draft Regulatory Guide entitled "Guide for the Preparation of Applications for Licenses and Approvals to Authorize Distribution of Various Items to Group Medical Licensees." Staff of the Bureau of Radiation Control have reviewed the document and offer the following comments for consideration:

- 1) Page 8 - Instructions for completion of Items 7, 8, and 9 of the application form imply that a separate license from one for distribution is needed for the possession and use of radioactive material. If this is true, the guide does not make clear why two licenses are needed. If authorizations may be combined on one license, then these items need to be addressed on the application.
- 2) Much of the information contained in the document could also be used as guidance for mobile scanning applications. For example, many of the procedures and labeling criteria are applicable to those types of licensees as well as distributors.

If you have any questions concerning these comments, please contact us.

Yours truly,

David K. Lacker, Chief
Bureau of Radiation Control

cc: Mr. Donald A. Nussbaumer
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