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November 25, 1985

Secretary of the Commission
US-NRC
Washington, D.C. 20555
Attention: Docketing and Service Branch

Dear Sir:

The North Carolina Radiation Protection Section does not concur with the flexibility that is provided in the proposal revision of 10 CFR, Part 35, "Medical Uses of Byproduct Material." Specifically, the licensee may make changes in their radiation safety programs without approval or review of the regulatory Agency; such as sealed source leak test procedures, bioassay programs, survey procedures, receipt transfer and disposal procedures, use areas, calibration procedures, and ventilation.

This state strictly controls the use of Xenon 127 and 133, plus other isotopes which require additional protection or procedures. This revision will allow the Xenon to be a preauthorized drug, and will also allow changes in ventilation without a review.

This revision will shift the program review from the licensing people to the inspection force, which will tie up facility personnel during the working day when they can least afford it.

It is my opinion that this revision will reduce this control over accentual parts of the program that protect workers and the general public.

Thank you for your consideration.

Sincerely yours,

Irma Holland for Cecil Brown

Cecil B. Brown, Head
Radioactive Materials Branch
Radiation Protection Section

CBB/lnh

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