UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

JUN 17 1982

W. Walker

MEMORANDUM FOR: R. E. Cunningham, Director, DFCMS, NMSS

FROM: James P. O'Reilly, Regional Administrator

SUBJECT: PROPOSED REVISION OF 10 CFR 35

REFERENCE: Your Memo, Same Subject, Dated May 5, 1982, W/Enclosure

In response to the reference we offer comments on the proposed revision as follows:

General:

The revision appears to be a significant advance in recodification of the diverse requirements in the medical area.

Specific:

1. Page 49, §35.51(a)(2), revise to require that other survey meters be calibrated in mr/hr or cpm/dpm at least every three years.

2. Page 49, §35.51(b)(1), revise to read "Calibrate all scales below 500 ...."

3. Page 49, §35.51(b)(2), revise to read "Calibrate two readings near the minimum and maximum points on each scale ...."

4. Page 49, §35.51(d), revise to read, "The licensee shall perform a functional test with a check source prior to each day's use.

5. Page 52, §35.59(d)(2), delete "Inspection and Enforcement" preceding "Regional Office".

6. Page 53, §35.62, retitle "Vial and Syringe Labels" and revise to read, "Each licensee shall label each vial and syringe shield ...." Reason: many misadministrations result from using an unlabelled syringe.

7. Page 54, §35.70(a), add ",including in-patient hospital rooms."

8. Page 59, §35.200(c), add (2), to read "Technetium-99m pertechnetate for direct cystographic studies of bladder function.

9. Page 60, §35.304(a), add (5), "Autopsy Control", add (6) "Embalming and Mortuary Control".

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10. Page 63, §35.606(f), revise to read "Changing the source to a type or curie content different than specified in the original license."

11. Page 64, §35.620(b), add (3) to read, "The licensee will perform a semi-annual mechanical and electrical check of the interlock system to test its operability and reliability.

12. Page 66, §35.630(a), join (1) and (2) with the disjunctive, "or", and restore the constancy check requirement for the calibrated dosimetry system.

13. Page 69, §35.633, delete (a), since (f) is more descriptive.

14. Page 73, §35.900, revise to be consistent with the proposed Regulatory Guide, "Qualifications for RSO's in a Large ... Radionuclide Program", April 1982, or vice versa.

Please advise me or my staff of any questions or problems.

Robert W Martin for

James P. O'Reilly