



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76012

March 22, 1982

MEMORANDUM FOR: Dr. William Walker, Section Chief, NMSS
FROM: Glen D. Brown, Chief, Technical Program Branch, RIV
SUBJECT: COMMENTS ON PART 35 - HUMAN USE OF BYPRODUCT MATERIAL

We have reviewed the February 25, 1982, draft on Part 35 - Human Use of Byproduct Material. Although this draft will be discussed at the task force meeting on March 25, 1982, we are providing you with the following comments prior to the meeting.

Generic Comments

- (1) In all instances where approximate hours of training is used, we suggest using minimum hours of training since we are not able to inspect against approximate.
- (2) All references to Regional Office of Inspection and Enforcement should be changed to Regional NRC Office.

Specific Comments

- (1) 35.16 - Should add "along with the licensing fee specified in 10 CFR Part 170"
- (2) 35.17(c) - Insert "as specified in 10 CFR 35.34" after visiting physician.
- (3) 35.30(a) - Insert "written" before policy.
- (4) 35.32(c) - Change to "establish a written policy and procedures"
- (5) 35.37(b) - Insert "to the NRC" between report and shall at bottom of page 13.
- (6) 35.38 - The definition of supervision needs to be more inclusive.
- (7) 35.51 - The requirements for calibration of survey instruments should require calibration at more than one point. We are not sure that only an annual calibration is frequent enough.
- (8) 35.503 - Suggest changing not contrary to as specified in.
- (9) 35.604 - Add "and radiation monitoring systems."

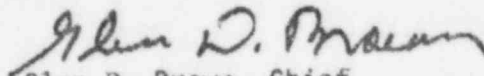
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- (10) 35.620(a) - Delete shall be in second sentence
- (11) 35.620(b) - Spelling - entrance
- (12) 35.621 - 1st paragraph substitute source radiation level for beam conditions - same for (a).
- (13) 35.630(3) - It is not clear just what is required by this section.


Glen D. Brown, Chief
Technical Program Branch

cc: J. T. Collins