DUKE UNIVERSITY MEDICAL CENTER

Department of Radiology

15 May, 1982

William J. Walker, Jr., Ph.D.
Material Licensing Branch
Division of Fuel Cycle and Material Safety
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Draft 10 CFR 35

Dear Doctor Walker:

I have reviewed the Draft copy of the position paper on the revision of 10 CFR 35, (regulations governing the human use of byproduct materials) and on the NRC's nuclear medicine licensing procedures. I found the position paper to be excellent and most of the proposed changes in nuclear medicine licensing procedures seem well presented and overdue particularly from the point of view of the licensee.

To discontinue issuing the general license would be no hardship on most licensees and would be most welcome to many. The streamlining of the application process for specific license is long overdue and should produce cries of joy from the nuclear medicine licensees. The proposed revision in regulations to provide a clear and consolidated source of requirements for human use is to be greatly applauded.

The proposed changes in (35.75) Release of Patients, from the current release criterion of 30 millicuries of radiopharmacuetical activity to an exposure rate of 5 milliroentgens per hour at a distance of one meter, may result in one additional day of hospitalization for many patients treated with 150 millicuries I-131 for thyroid cancer, according to our Radiation Safety Officer. Perhaps you have additional information on this item from other sources.

Thank you for allowing me to review this draft.

changed to 6 mR

Sincerely,

Joseph B. Workman

Joseph B. Workman, M.D.

jbw/hs

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