



NORTH DAKOTA
STATE DEPARTMENT OF HEALTH

State Capitol
Bismarck, North Dakota 58505

Belling
M. A. K. Lommen, M.D., R.P.E.
State Health Officer

June 4, 1982

Environmental Health Section
Missouri Office Building
1200 Missouri Avenue
Bismarck, North Dakota 58501

Mr. Donald A. Nussbaumer
Assistant Director for State
Agreements Program
Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Nussbaumer:

Thank you for the opportunity to comment on the Proposed
Revision to Part 35, on Human Uses of Byproduct Material.

It is the opinion of this office, that there is a need to
focus resources on important safety issues and to improve
quality control in the licensing process as well as improving
records management and paper flow. It is also agreed that
if the amount of paperwork involved could be reduced, there
would also be a financial savings for the licensee and a
manpower savings for the agency.

However, this office has some doubt, with respect to the
possibility of the licensee recovering an additional \$2,680,000
due to the reduction of processing time, for an amendment,
from 77 days to 10 days. This office does not feel that the
licensee will wait, or has waited in the past, for amendment
approval before allowing a new physician to begin performing
radiography.

Again, thank you for allowing this office to comment.

If you have further questions, please contact this office.

Sincerely,

Dana K. Mount, P.E.
Director, Division of
Environmental Engineering

DKM/DPP:dmj

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