



THE UNIVERSITY OF TEXAS SYSTEM CANCER CENTER

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Department of Physics

June 7, 1982

William J. Walker, Jr., Ph.D.
U.S. Nuclear Regulatory Commission
Material Licensing Branch
Washington, D.C. 20555

Dear Bill:

I have been reviewing the proposed revision of 10 CFR Part 35 and I note that you want comments back by June 9th. I'm still not finished with my review but at this stage I would like to make several comments for your consideration-

1) I've been a little confused by the number of revisions and guides that have appeared relevant to 35, this year e.g. "Revised Training and Experience Criteria for Nuclear Medicine Physicians", "Guide for the preparation of Applications for liscenses in Medical Teletherapy Programs." Will the new guide for liscense preparation be consistent with the existing regulations or will it be compatible with the proposed revision of 10 CFR Part 20, 35 etc? It appears to me that there are a lot of revisions being proposed. If there is a master plan for these and the dates that they are to be accomplished it would be helpful to me to keep up with them all.

2) I'm very much in agreement with the overall changes in part 35 and the philosophy behind making them.

3) I'm not too happy with the ALARA program. Is it too late to make any changes?

4) The requirements of a qualified expert on page 84 of Enclosure 1 is different than the existing 35.24. I do not agree with the proposed 35.633.961 I think

5) On page 73 of Enclosure 1, 35.900 the Radiation Safety Officer. The American Board of Radiology in Physics should also be included.

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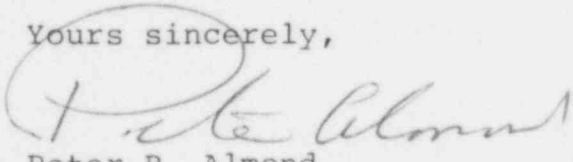
good comment.
relayed to Bill
thanks

gyp
biv
done

6) Is the ACMUL going to have a meeting to discuss the revised
35?

I will have some more comments later.

Yours sincerely,



Peter R. Almond
Physicist

PRA:em