



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 17, 1983

MEMORANDUM FOR: William J. Walker
FROM: Clyde Jupiter *Clyde Jupiter*
SUBJECT: PROPOSED REVISION OF 10 CFR PART 35 "HUMAN USE OF
BYPRODUCT MATERIAL," SECY-83-62

In our analysis of SECY-83-62 we noticed a couple of items which you may want to revise in the final draft of the proposed rule 10 CFR Part 35.

1. Part III of the Form NRC 313 MH, "Application For Materials License - Human Use," offers three check-off boxes as options for a physician to indicate how he meets NRC training and experience requirements. We note that the information provided for box "a" is partly redundant with that provided for box "b". A check in box "a" indicates the physician has Board certification, while a check in box "b" indicates that the physician has training and experience as specified in 10 CFR Part 35, subpart J. However, subpart J of Part 35 also includes Board certification in its options for fulfilling requirements. This redundancy may be removed by deleting box "a" from the group of check-off options, or by removing the Board certification provision from subpart J.
2. The caption for box "b" should read "....10 CFR Part 35 subpart J" instead of "....10 CFR 35 subsection J".

I hope these comments are useful.

cc: Dennis Rathbun
John Zerbe

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