



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA ST., N.W., SUITE 3100  
ATLANTA, GEORGIA 30303

*W. L. Sher*

September 2, 1982

MEMORANDUM FOR: Richard E. Cunningham, Director  
Division of Fuel Cycle and Material Safety, NMSS

FROM: James P. O'Reilly  
Regional Administrator

SUBJECT: PROPOSED REVISION OF 10 CFR 35

REFERENCE: Your Memo, Same Subject, 8/17/82

Pursuant to the referenced request for review, we concur with the current version subject to reservations as follows:

1. Page 54, §35.51(2) - Change to read "Calibrate other survey instruments once per year and following repair."
2. Page 68, §35.622 - Add phrase at the end of the first sentence: "and shall not perform treatments when observation is not possible".
3. Page 75, §35.900(a) - Add phrase after (3); or "hold a B.S., M.S., or Ph.D degree with a major in Health Physics, Medical Physics, Biophysics, or Radiological Physics, from a regionally accredited college or university."

We consider this final draft of the proposed 10 CFR 35 to be a substantial improvement over existing regulations and commend your staff for their excellence and innovative approaches.

*Robert W. Martin for*  
James P. O'Reilly

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35 50FR30616 PDR

*Called Al Gibson on 9/17/82. Rg II  
reservations were satisfactorily resolved.  
He gave Rg II concurrence.*