

NOTATION VOTE

RESPONSE SHEET

cc: WDircks

JRoe

WKerr

~~JDavis~~

*Mc Elroy*  
*506 B*  
*FYI*  
*Mc*  
*5/1*

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER ASSELSTINE

SUBJECT: SECY-84-485 - PROPOSED REVISION OF 10 CFR PART 35  
"MEDICAL USE OF BYPRODUCT MATERIAL"

*1 Davis*  
*2 Mass...*  
*[Signature]*

APPROVED x as modified DISAPPROVED \_\_\_\_\_ ABSTAIN \_\_\_\_\_  
NOT PARTICIPATING \_\_\_\_\_ REQUEST DISCUSSION \_\_\_\_\_

COMMENTS:

I do not agree with the proposed Section 35.36 which would allow licensees to make changes to their radiation safety program without prior regulatory review and approval. I would retain the license amendment process which would require review of all modifications to a license.

I believe that all licensees, including physicians, should be required to have a formal ALARA review of their radiation safety programs. One of the physicians at the March 20, 1985 Commission meeting thought it was a prudent measure, and I agree. The proposed rule should be modified as such.

I agree with Commissioner Zech's suggestion to solicit public comment on his three questions concerning medical misadministration. I also agree with Commissioner Bernthal's suggestion that we receive comment on NRC's enforcement role and responsibilities in the area of medical misadministration.

*[Signature]*  
SIGNATURE  
4-28-85  
DATE

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PDR PR  
35 50FR30616 PDR

SECRETARIAT NOTE: PLEASE ALSO RESPOND TO AND/OR COMMENT ON OGC/OPE MEMORANDUM IF ONE HAS BEEN ISSUED ON THIS PAPER.