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UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76012

AUG 30 1982

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

THRU: John T. Collins, Regional Administrator, Region IV

FROM: Glen D. Brown, Chief, Technical Programs Branch

SUBJECT: PROPOSED REVISION OF 10 CFR PART 35

Reference: Memorandum dated August 17, 1982, Cunningham to Collins

We have reviewed the subject document and have the following concern:

§ 35.51

We have problems concurring with the regulation for not calibrating GM-Type survey instruments after initial calibration or servicing. Without arguing the technical merits of calibration of these devices, the requirement is not consistent with Regulatory Guide 10.8 nor 10 CFR Part 34.24 which requires calibration of survey instruments at intervals not to exceed 3 months and after each servicing. Almost all of the survey instruments used in radiography are GM types.

*changed
to 6 months*

We have the following editorial comments:

- (1) On page 6 of the letter from Mr. Dirks to the Commissioners a statement is made that the license and cover letter . . . copy to Regional Office of Inspection and Enforcement. This should be changed to the Regional NRC Office.
 - (2) § 35.38 Supervision
 - (9) The word unlicensed receipt should be changed to licensed.
 - (3) § 35.900 Radiation Safety Officer
- done*
- No change
transmitted*
- done*

An "or" should be added following Health Physics since we do not believe it is the intent that both (9)(1) and (2) are required.

R. D.

Glen D. Brown, Chief
Technical Programs Branch

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