

October 29, 1984

MEMORANDUM FOR: Donald B. Mausshardt, Deputy Director
Office of Nuclear Material Safety and Safeguards

FROM: A. Bert Davis, Deputy Regional Administrator
Region III

SUBJECT: PROPOSED REVISION OF PART 35

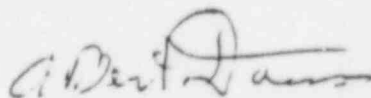
The purpose of this memorandum is to clarify Region III's position with respect to this proposed revision of Part 35. It is as follows:

Although Region III concurs in Alternative 2, i.e., "Publish the proposed revision of Part 35 attached as Enclosure 1," we would have preferred the following:

"Publish the proposed revision of Part 35 after modifying Section 35.36 to require that applicants and licensees submit those changes to their radiation safety programs which decrease their effectiveness for NRC review and approval prior to implementation."

We believe this course of action would assure program changes are carefully considered by licensees and would provide added assurance that programs would not be degraded from a safety standpoint.

If you have any questions on our position, please call me.



A. Bert Davis
Deputy Regional Administrator