

Belling



COLORADO DEPARTMENT OF HEALTH

Richard D. Lamm
Governor

Frank A. Traylor, M.D.
Executive Director

April 11, 1984

Donald A. Nussbaumer
Assistant Director for
State Agreement Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Nussbaumer:

The following are Colorado's comments on the latest version of the proposed revisions to Part 35, and Regulatory Guide 10.8.

1. The revisions are an improvement over the previous versions, however, we still have concern that facilities will not be cognizant of requirements until after they are inspected. The fact that 40% of the applicants receive deficiency letters should indicate that the NRC should not relax its licensing procedures. ✓
2. Mobile Nuclear Medicine licensees should be required to submit a letter of authorization from the administration of each facility they service. Otherwise, one physician at a facility could request service without the approval of his management. ✓
3. Section 35.34 should specify a shorter period of time for visiting physicians. A sixty-day (60) period would be more appropriate. As now proposed, a small hospital could function with only visiting physicians and need not have one named on their license. ✓
4. Several sections appear to preclude licensees from using consulting services. ✓
5. We agree with the requirements in 35.50 and 35.53 regarding dose calibrations and dose assay; but many of our licensees do not. They argue that if they purchase individual doses from a nuclear pharmacy, the pharmacy should be responsible for validating the dose. They draw the analogy that a physician is not required to chemically or physically verify non-radioactive pharmaceuticals. ✓

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6. Records should be retained at least until the next inspection. There can be situations such as extended leave by the RSO, which cause problems indicating a flaw in the facilities organization and/or procedures. If all records generated between inspections are not available for review, such problems will not be corrected.
7. 35.59 should delete the subheading "brachytherapy sources", as the section also addresses teletherapy sources (35.59(c)(2)).
8. Section 35.62 should delete "to be administered" as all radioactive materials containers should be labeled. *Odor*
9. Section 3.622 should require that teletherapy operations cease if the view system is inoperatable. ✓

If you have any questions on these comments, or if I can be of further assistance, do not hesitate to contact this Division.

Sincerely,

W. Hazle
Albert J. Hazle, Director
Radiation Control Division

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