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April 23, 1984

Mr. Donald A. Nussbaumer
Assistant Director for
State Agreements Program
Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Nussbaumer:

Thank you for the opportunity to comment on the proposed revisions of 10 CFR Part 35 and Regulatory Guide 10.8.

Bureau of Radiation Control staff have reviewed the documents and offer the following comments for consideration:

A. General Comment

The rules as proposed place an undue burden for license review procedures upon compliance personnel. This will tremendously increase inspection time and will add inconsistency to review procedures. The inspector is put in the position of reviewing changes in procedures in the field without sufficient time or reference material for adequate evaluation.

B. Comments on Specific Sections of Part 35

1. Sections 35.70(f) and 35.315(f) require the detectability for wipe surveys to be 200 disintegrations per minute on the wipe sample. It is doubtful that most low-range survey meters used in hospitals can detect that amount of radioactivity. In addition, higher contamination limits should be established in restricted areas as opposed to unrestricted areas.
2. Section 35.404 should also include a requirement to provide patients having permanent implants of gold-198 seeds or iodine-125 seeds with instructions concerning radiation, sloughed seeds, etc. A requirement for surveying areas where seeds are implanted should also be addressed.

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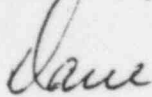
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C. Comments on Regulatory Guide 10.8

1. Appendix J, page 52, paragraph 6 - This paragraph needs clarification. The action level of 0.07 microcuries of molybdenum-99 per millicurie of technetium-99m is about one-half the allowable amount authorized under 35.204 of the proposed rules.
2. Appendix N - The procedures do not include recommendations for use of an instrument calibration device or for limiting exposures to calibration personnel. The use of devices to collimate the radiation during instrument calibration should be encouraged.
3. Appendix P - The last paragraph indicates a .005 microcurie action limit for all leak tests. Has the .05 microcurie limit for teletherapy sources changed?
4. Appendix R - Paragraph 10 should include precise instructions for performing bioassays for iodine-131.
5. The Applicability Table on page 12 of the guide is excellent in concept.

If you have any questions regarding this matter, please contact us.

Yours truly,



David K. Lacker, Chief
Bureau of Radiation Control

cc: Michael H. Mobley, Chairman
Agreement States