



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Health
CANNON BUILDING
Davis Street
Providence, R.I. 02908

4 October 1983

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

*REC 8-26-83
"Plan" memo*

Dear Mr. Nussbaumer:

We would like to respond to your memorandum of 12 September 1983, which requested comment on the staff's plan for the revision of medical licensing procedures, in accordance with a recent directive of the Commission on this matter.

It does not appear that the staff's radiation safety plan concept complies with the Commission's directive to "continue the pre-licensing review of applicants' operating procedures." Nevertheless, we think the concept has merit, in that it may well serve to increase the licensees' awareness of the commitments contained in their operating procedures.

We subscribe to the practice of encouraging the adoption of standard operating procedures, as they provide a common basis for communication among licensing, inspection, and licensee personnel. Additionally, standard operating procedures permit inspections to be thorough and efficient. We think that the imposition of a radiation safety plan on medical license applicants will tend to encourage the adoption of standard operating procedures.

In order to satisfy both the Commission's directive and the States' concerns, it is suggested that applicants should be required to submit (in addition to their radiation safety plans) any operating procedures, or portions of operating procedures, which deviate from those offered in the Regulatory Guide. It is our steadfast opinion that procedures developed by applicants will continue to contain significant errors, inadequacies and omissions. To ensure that licensee procedures are adequate to protect health and safety, we feel that it is essential to correct such deficiencies prior to issuing licenses.

Thank you for providing the opportunity to comment on this important matter.

Sincerely,

COMMUNITY HEALTH SERVICES

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James E. Hickey, Chief
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