

November 4, 2020

Mr. Robert Lewis, Deputy Director  
Division of Materials Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety  
And Safeguards  
U.S. Nuclear Regulatory Commission  
T8-E18  
Washington, D.C. 20555-0001

Dear Mr. Lewis:

Enclosed is a copy of the final revisions to the Nebraska Radiological Health regulations 180 Nebraska Administrative Code (NAC) 7, *Medical Use of Radioactive Material*, effective November 3, 2020. The final regulations are identified by line-in/line-out text and correspond to the following equivalent amendments to NRC's regulations.

Nebraska Governor Pete Ricketts signed Executive Order 17-04, *Regulatory Reform*, June 6, 2017. This executive order required every state agency to review and reduce regulatory burden. Changes to 180 NAC 7 include updated formatting, removal of duplicative statutory language, and the incorporation of the following RATS which are identified as requested:

RATS ID	Title	State Section
2018-1	§ 35.12 Definitions	180 NAC 7-002
2018-1	§ 35.13 License amendments	180 NAC 07-010
2018-1	§ 35.14 Notifications	180 NAC 07- 011
2018-1	§ 35.15 Exemptions regarding Type A specific licenses of broad scope	180 NAC 07- 012
2018-1	§ 35.24 Authority and responsibilities for the radiation protection program.	180 NAC 07-015.04
2018-1	§ 35.40 Written directives	180 NAC 07-019.02 – 019.03
2018-1	§ 35.41 Procedures for administrations requiring a written directive	180 NAC 07-020.02
2018-1	§ 35.50 Training for Radiation Safety Officer and Associate Radiation Safety Officer	180 NAC 07-022.01 – 022.05
2018-1	§ 35.51 Training for an authorized medical physicist.	180 NAC 07-023.01, 7-023.03
2018-1	§ 35.57 Training for experienced Radiation Safety Officer, teletherapy or medical physicist, authorized medical physicist, authorized user, nuclear pharmacist, and authorized nuclear pharmacist.	180 NAC 07-026.01 – 026.06


2018-1	§ 35.65 Authorization for calibration, transmission, and reference sources.	180 NAC 07-32.01
2018-1	§ 35.190 Training for uptake, dilution, and excretion studies.	180 NAC 07-043.01, 043.03, 043.04
2018-1	§ 35.204 Permissible molybdenum-99, strontium-82, and strontium-85 concentrations	180 NAC 07-045.05
2018-1	§ 35.290 Training for imaging and localization studies	180 NAC 07-047.01, 047.03, 047.04
2018-1	§ 35.300 Use of unsealed byproduct material for which a written directive is required	180 NAC 07-048
2018-1	§ 35.390 Training for use of unsealed byproduct material for which a written directive is required	180 NAC 07-051.01 – 051.03
2018-1	§ 35.392 Training for the oral administration of sodium iodide I-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries)	180 NAC 07-052.01 – 052.04
2018-1	§ 35.394 Training for the oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 gigabecquerels (33 millicuries)	180 NAC 07-053.01, 053.03, 051.04
2018-1	§ 35.396 Training for the parenteral administration of unsealed byproduct material requiring a written directive	180 NAC 07-054.04
2018-1	§ 35.400 Use of sources for manual brachytherapy	180 NAC 07-055
2018-1	§ 35.433 Strontium-90 sources for ophthalmic treatments	180 NAC 07-060.05, 060.07
2018-1	§ 35.490 Training for use of manual brachytherapy sources	180 NAC 07-063.01 - 063.03
2018-1	§ 35.491 Training for ophthalmic use of strontium-90	180 NAC 07-064.02,(C)
2018-1	§ 35.500 Use of sealed sources and medical devices for diagnosis	180 NAC 07-064.02,(C)
2018-1	§ 35.500 Use of sealed sources and medical devices for diagnosis	180 NAC 07-065
2018-1	§ 35.590 Training for use of sealed sources and medical devices for diagnosis.	180 NAC 07-066
2018-1	§ 35.600 Use of a sealed source in a remote afterloader unit, teletherapy unit, or gamma stereotactic radiosurgery unit	180 NAC 07-067
2018-1	§ 35.610 Safety procedures and instructions for remote afterloader units, teletherapy units, and gamma stereotactic radiosurgery units	180 NAC 07-070.04

2018-1	§ 35.655(a) Full-inspection servicing for teletherapy and gamma stereotactic radiosurgery units	180 NAC 07-081.01
2018-1	§ 35.3045 Report and notification of a medical event	180 NAC 07-115.01
2018-1	§ 35.3204 (new) Report and notification for an eluate exceeding permissible molybdenum-99, strontium-82, and strontium-85 concentrations	180 NAC 7-120.

We believe that adoption of these revisions satisfies the compatibility and health and safety categories established in the Office of Nuclear Material Safety and Safeguards (NMSS) Procedure SA-200.

If you have any questions, please feel free to contact me at 402-471-0528 or Deb Wilson of my staff at 402-471-0560 or [deb.wilson@nebraska.gov](mailto:deb.wilson@nebraska.gov).

Sincerely,



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Enclosures:  
180 NAC 7 – Final Changes

