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Ms. Catherine Haney
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US Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

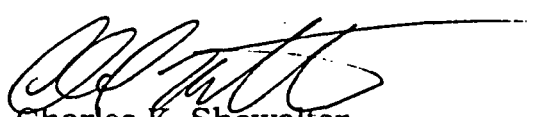
DOCKET NUMBER
PROPOSED RULE **PR** 20,32+35
(63FR43516)

Dear Ms. Haney:

We at the American College of Radiology read with interest the draft final rule of 10 CFR 35 you provided to the NRC Commissioners in anticipation of your briefing on October 21, 1999. In particular, we were happy to see that the alternative requirements for an authorized user under section 35.290, training for imaging and localization studies, has remained at 700 hours. We believe that this is a reasonable and necessary level of training for this purpose.

We appreciate the opportunity to participate in the rulemaking process, and would be happy to provide any further information that would be helpful to you during the completion of this process.

Sincerely yours,


Charles K. Showalter
Director, Federal Programs