

Comment Info: =====

General Comment: The emphasis in this regulation should be on source strength alone and not

source activity. Confusion between the two often leads to misadministrations. In the following paragraph of 10 CFR 35.40, "nominal activity per source" should be replaced by "nominal or actual strength per source". Our treatment plans are calculated with the manufacturer's nominal strength decayed to the actual time of the implant. Asking for the nominal activity is just wrong, and asking for the nominal strength unnecessarily discourages use of a properly decayed value.

Some manufacturers calibrate and state their nominal strength at dates and times far removed from the time of use making the use of a nominal strength nearly meaningless.

? 35.40 (b) (6) (ii) After administration but before the patient leaves the post-operative treatment recovery area: the number of sources and nominal activity per source implanted, the date, and signature of AU; or

DOCKETED  
USNRC

February 26, 2008 (10:30am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

## **Secy**

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**From:** Carol Gallagher  
**Sent:** Monday, February 25, 2008 3:55 PM  
**To:** Secy  
**Subject:** Comment letter on Draft Rule Language AI-26  
**Attachments:** NRC-2008-0071-0004butler.txt

Van,

Attached for docketing is a comment letter on the above noted draft rule language from Wayne Butler that I received via the regulations.gov website on 2/22/08.

Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by TWMS01.nrc.gov  
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From: Carol Gallagher <Carol.Gallagher@nrc.gov>  
To: Secy <SECY@nrc.gov>  
Date: Mon, 25 Feb 2008 15:55:11 -0500  
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