

PR 35
(73FR45635)



PUBLIC SUBMISSION

As of: August 21, 2008 Received date: Not specified Status: Pending Post Tracking No. 806bd98c Comments Due: October 20, 2008 Submission Type: Web

Docket: NRC-2008-0071
Medical Use of Byproduct Material - Amendments/Medical Event Definitions

DOCKETED
USNRC

Comment On: NRC-2008-0071-0018
Medical Use of Byproduct Material--Amendments/Medical Event Definitions

August 22, 2008 (9:53am)

Document: NRC-2008-0071-DRAFT-0018
Comment on FR Doc # E8-18014

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Submitter Information

Name: Robert D Skowronek

Address:

PO Box 30241
Lansing, MI, 48909-7741

Organization: Michigan Dept of Env Quality/WHMD/RPS

Government Agency Type: State

Redacted Comment

RIN 3150-AI26 Medical Use of Byproduct Material: Amendments/Medical Event Definitions

I recommend that the wording of 10 CFR 35.40(c)(2) be revised from

"If, because of the patient's condition, a delay in order to provide a written revision to an existing written directive would jeopardize the patient's health, an oral revision to an existing written directive is acceptable. The oral revision must be documented as soon as possible in the patient's record. A revised written directive must be signed by the authorized user within 48 hours of the oral revision."

to

"If a delay to obtain a written revision to an existing written directive would jeopardize the patient's health, an oral revision to an existing written directive is acceptable. The oral revision must be documented as soon as possible in the patient's record. The authorized user must sign a revised written directive within 48 hours of the oral revision."

Template = SECY-067

SECY-02

The phrase "because of the patient's condition" essentially duplicates the meaning of "jeopardize the patient's health" and can be eliminated. The last sentence is changed to active voice.

Thank you for the opportunity to comment on these proposed regulations.

Robert D. Skowronek, Chief
Radioactive Materials Unit
Radiological Protection Section
Waste and Hazardous Materials Division
Michigan Department of Environmental Quality
Telephone: 517-241-1253

Original Comment

RIN 3150-AI26 Medical Use of Byproduct Material: Amendments/Medical Event Definitions

I recommend that the wording of 10 CFR 35.40(c)(2) be revised from

"If, because of the patient's condition, a delay in order to provide a written revision to an existing written directive would jeopardize the patient's health, an oral revision to an existing written directive is acceptable. The oral revision must be documented as soon as possible in the patient's record. A revised written directive must be signed by the authorized user within 48 hours of the oral revision.

to

"If a delay to obtain a written revision to an existing written directive would jeopardize the patient's health, an oral revision to an existing written directive is acceptable. The oral revision must be documented as soon as possible in the patient's record. The authorized user must sign a revised written directive within 48 hours of the oral revision."

The phrase "because of the patient's condition" essentially duplicates the meaning of "jeopardize the patient's health" and can be eliminated. The last sentence is changed to active voice.

Thank you for the opportunity to comment on these proposed regulations.

Robert D. Skowronek, Chief
Radioactive Materials Unit
Radiological Protection Section
Waste and Hazardous Materials Division
Michigan Department of Environmental Quality
Telephone: 517-241-1253

Rulemaking Comments

From: Carol Gallagher
Sent: Thursday, August 21, 2008 4:32 PM
To: Rulemaking Comments
Subject: Comment on Medical Use of Byproduct Material-Amendments/Medical Event Definitions (AI26)
Attachments: skowronek.pdf

Attached for docketing is a comment letter on the above noted proposed rule that was published on 8/6/08 at 73 FR 45635.

Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by OWMS01.nrc.gov
([148.184.100.43]) with mapi; Thu, 21 Aug 2008 16:31:55 -0400
Content-Type: application/ms-tnef; name="winmail.dat"
Content-Transfer-Encoding: binary
From: Carol Gallagher <Carol.Gallagher@nrc.gov>
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>
Date: Thu, 21 Aug 2008 16:31:53 -0400
Subject: Comment on Medical Use of Byproduct Material-Amendments/Medical
Event Definitions (AI26)
Thread-Topic: Comment on Medical Use of Byproduct
Material-Amendments/Medical Event Definitions (AI26)
Thread-Index: AckDzPKJlzwmUouzQBWN89aw2ah67g==
Message-ID:
<83F82891AF9D774FBBB39974B6CB134F62FD0A997B@HQCLSTR01.nrc.gov>
Accept-Language: en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-Exchange-Organization-SCL: -1
X-MS-TNEF-Correlator:
<83F82891AF9D774FBBB39974B6CB134F62FD0A997B@HQCLSTR01.nrc.gov>
MIME-Version: 1.0