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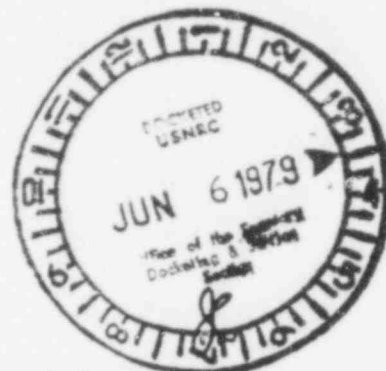
May 31, 1979

DOCKET NUMBER

PROPOSED RULE

43
PR-35 (44 FR 21023)

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Docketing and Service Branch



Sir:

The American College of Nuclear Physicians wishes to comment on the proposed rule to change the Medical Isotopes Committee required by 10 CFR 35.11, paragraph (b) as published in the Federal Register Volume 44, no. 69, page 21023 (9 April 1979).

The proposed change will achieve its goal of simplifying committee structure in smaller institutions and will have a beneficial effect.

Requiring a committee member from each department where radioactive material is used would result in an unnecessarily large committee in bigger institutions, causing difficulty in conducting committee business.

NRC policy in the past few years has been to consolidate licenses of major centers into a single broad license covering all uses of radioactive material in the center. Radioisotopes may be used in 10-20 or conceivably more departments. The committee could readily consist of 15-25 members, a number unlikely to conduct business in an expeditious manner. Some departments may use radioactive material to only a minor extent, participation in Radiation Safety Committee meetings by such a department would be unnecessary duplication of effort.

The word department connotes a specific meaning, especially in a University setting. Use of a more general term would satisfy safety requirements and allow more flexibility in appointing a committee.

Sincerely,

G. John Weir, Jr., M.D.
Co-Chairman, Government Affairs
Committee
American College of Nuclear
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cc: Lawrence R. Muroff, M.D.
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Acknowledged by card... 6/7/79

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