



DOCKET NUMBER
PROPOSED RULE

(NRC PUBLIC DOCUMENT ROOM)

PR- *Miss Notice*
Reg
RIVERVIEW HOSPITAL ASSOCIATION

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Service Branch

May 23, 1979

RE: NRC Regulatory Guide #10.8, dated January 1979

Gentlemen:

We object to item 1 and items 4b and 6 of Appendix I "Area Survey Procedures" in the proposed Regulatory Guide 10.8 "Guide for the Preparation of Applications for Medical Programs", dated January 1979.

Our reasons are that a "thin window" survey meter is not necessary to detect low level radiation. A low range survey meter, capable of detecting less than 0.05 mr/hr would be a more specific description.

We also strongly object to the proposed 100 DPM sensitivity requirement for area wipe tests. That level is much too low to be practical. We propose 100 CPM (counts per minute) as an actionable level for decontamination, as detectable with checking wipe samples on most low level survey meters.

Further, I recommend that NRC field inspectors be advised not to cite "noncompliance" for statements contained in regulatory guides or license guides. A "guide" indicates some degree of individual flexibility and interpretation, as opposed to requirements stated in Title 10 of the Code of Federal Regulations.

Sincerely,

Dr. Andrew M. Lucas, Radiologist
Chairman, Medical Isotope Committee
Radiation Safety Officer

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Acknowledged by card... *6/13 g*

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