JERA

TP 810-1

44 FR 21023G, Podolak

d

dielman consultants, inc.

management consultants to health care institutions and industry manufacturers; specialists in medical imaging and bioassay

DOCKET NUMBER PROPOSED RULE PR-35 (53)

44 FR 21023

May 1?, 1979

Ed Podolak
Office of Standards Development
U. S. Nuclear Regulatory Commission
5650 Nichelson Lane
Washington, D. C. 20555

Good day, Mr. Podolak:

Pursuant to recent proposed rule making concerning radiation safety committees I am in agreement in principle, however, I offer the following for your consideration:

1) Please define "Representative of Management". As stated, this could mean the Chief Technologists or any departmental manager, or is this a representative of management as defined in ALARA, NUREG-0267 and regulatory guide 8.18.

2) In keeping with recent recommendations by the Food and Drug Administration which appeared in the Federal Register for one radiation safety committee concerned with all types of radiation in an institution, should not a representative from each area that uses radiation be appropriate? This approach would be cost effective as it would create one committee in place of four separate committees and meet once rather than four times with a view toward meeting the requirements of the NRC, State, JCAH, and recommendations of FDA.

3) With reference to - a representative from each area of use. What is the level, managerial or technical of the representative.

Other concerns, not included in the Federal Register Notice concerning radiation safety, but important include for your consideration the discernible lack of controls for radium utilization, instrument quality assurance except for dose calibrators, uncertainties regarding Part 20.205 - although most acute general hospital departments of nuclear medicine are exempt except for paragraph D the licensing guide implies there is no choice and requests compliance with 20.205 paragraphs A, B, and C; return of waste to a commercial nuclear pharmacy without reference in institutional licenses, uses of 14 Carbon apparently beyond Part 31 intentions and in violations of Part 20 license exempt quantities, the fact that institutional licenses presumably supersede all existing licenses and regulations but companies continue to ship Part 31 registrants.

Kindest personal regards.

7909250099

Cordially,

[signature]

1023 317

Acknowledged by card 6.21.79

RWD:bsu Dielman

DOCKETED USNRC JUN 20 1979 Office of the Secretary Docketing & Service Section