



# WHEELING HOSPITAL

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DOCKETED  
USNRC

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DOCKETING & SERVICE  
BRANCH

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch  
Re: TM 608-4

DOCKET NUMBER  
PROPOSED RULE **PR-Misc. Notice**  
**(Reg Guide)**

Dear Gentlefolk:

There are a few comments listed below pertaining to the Draft Regulatory Guide TM 608-4, "Guide for the Preparation of Applications for Licenses in Medical Teletherapy Programs"

- 1 p.3, Item 3., Filing an Application, paragraph 1. The first sentence specifies that the license application "should be submitted on Form NRC-313T, 'Application for Materials License -- Teletherapy,' (see Exhibit A)." Why not follow that sentence with an address where form(s) NRC-313T may be obtained. It would not take much space and although someone may have the guide, they may not have the appropriate forms.
- 2 p.3, Item 3., Filing an Application, paragraph 2 - restricts the graphics and drawings to the size 17 inches by 22 inches if it must not exceed 8½ x 11 when folded twice. This placed undue burden on the Medical facility since the architectural blueprints are often larger than this and reduction to conformable size may force the copies to violate conditions set forth in paragraph 1, i.e. all information legible and can be read by unaided normal eyes. Suggestion: eliminate size restriction on blueprints or increase permitted size.
- 3 (a) p.19, Appendix A, item #3 under Duties - a program of instruction to all radiation workers more properly should be the responsibility of the Radiation Safety Committee or the Radiation Safety Officer. A review of the efforts of the RSC or RSO by the Medical Isotopes Committee is okay.
- (b) items #4 and #5 appear to conflict or overlap with the responsibilities of the RSC or RSO, particularly if a Medical facility merely adopts the presented forms for the Medical Isotope Committee, Appendix A, and the Alara program, Appendix I. A clearer separation of responsibility is in order.

Other than these few problem areas the proposed guide is clear, offers concise questions and provides adequate and helpful suggestions for acceptable procedures and operations.

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PDR REGGD  
10. XXX C PDR

Sincerely,

*Arthur E. Moren*

Arthur E. Moren, Ph.D.

DS09

add Ed Hill  
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Acknowledged by card

8/5/82 emp