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DOCKET NUMBER PR-35
PROPOSED RULE (47 FR 18131)

AMERICAN COLLEGE OF RADIOLOGY

25 June 1982

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Sir:

The following comments are submitted on behalf of the 16,000 members of the American College of Radiology regarding a proposed rule, "Teletherapy Room Radiation Monitors and Inspection and Servicing of Teletherapy Machines," under 10 CFR 35, published in 47 FR 18131-18132.

It is our understanding that these proposals would codify previous orders issued to existing teletherapy licensees and would pertain to new applicants as well. We believe these well-written proposals will greatly aid an institution in preparing an NRC license application.

We recommend, however, a modification to paragraph 35.25 (a) that portable survey instruments be used whenever the permanent radiation monitors are not operating. A personal radiation monitor giving an audible warning would also be satisfactory. An example of this type is the Victoreen PRIMA IIB-Dual Range Personal Radiation Monitor.

We note in the proposed rules, however, several items that do not appear in the 1980 Directive. One of these which appears in paragraph 35.25 (b), states: "The visible indicator of high radiation levels must be located so as to be obtainable by a person entering the room and during the operation of the unit." The phrase "during operation of the unit" should be clarified. If it means that the independent monitor must be visible during treatment, there are some difficulties since the independent monitor is usually located at the end of the maze opposite the treatment room door and thus does not appear within the television range scope. If the monitor should be visible during the treatment of a patient this would imply that a second independent monitor must be within the range of the TV and the original monitor must be as visible as the technician enters the treatment room. If this interpretation is correct, there will be an increase in cost, probably several hundred dollars.

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Acknowledged by date 6/29/82 mdv

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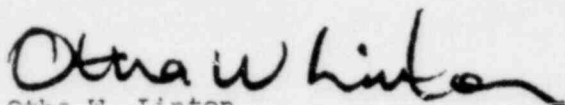
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A second item requires that the independent radiation monitor be tested every day. I would expect many technologic staffs would not perform this task diligently and that in fact the monitor may not be tested daily. There is also a suspicion that records should be kept of the testing, some sort of a log book, even though at present the NRC does not make such a requirement.

We also noticed under paragraph 35.27 that calibration reports must now contain the record of calibration from either the National Bureau of Standards or one of the regional calibration laboratories on the instruments used to calibrate the teletherapy machine. This is a new requirement and though it does not present any difficulties it does increase the amount of paperwork.

We appreciate the opportunity to comment on the proposals and would be happy to provide additional information if requested.

Sincerely,



Otha W. Linton
Director of Governmental Relations

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