



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 3, 1994

MEMORANDUM FOR: The Chairman
Commissioner Rogers
Commissioner Remick
Commissioner de Planque

FROM: James M. Taylor
Executive Director for Operations

SUBJECT: PARTICIPATION OF AGREEMENT STATES IN DEVELOPMENT OF NRC'S
MEDICAL MANAGEMENT PLAN DESCRIBED IN SECY-93-244

As you are aware, the Organization of Agreement States briefed the Commission on February 8, 1994, on Agreement State issues. One issue discussed was development of the staff's Medical Management Plan (MMP) as described in SECY-93-244, "Proposed Staff Management Plan for NRC's Medical Use Regulatory Program." Specifically, the Agreement States were critical of U.S. Nuclear Regulatory Commission staff for failure to involve them during development of the MMP. In response to this comment, the staff provides the following for your information.

1. The staff involved the Agreement States early in the development of the MMP by discussing the Medical Issues paper with their representatives at the October 1992 All Agreement States meeting. The Medical Issues paper, developed during September 1992, was the predecessor to the MMP and identified program areas to be reviewed for possible modification. At this meeting, NRC staff solicited comments and identified areas of mutual concern. Comments provided by Agreement State representatives were considered along with those of NRC regional managers and the Advisory Committee on the Medical Uses of Isotopes (ACMUI) during separate meetings held in the fall of 1992.
2. During May 1993, the staff discussed development of the MMP with Agreement States' representatives at the annual meeting of the Conference of Radiation Control Program Directors. Specifically, Dr. Carl J. Paperiello solicited comments on proposed modifications to program areas that would affect Agreement States. Topics included materials regulations, inspection procedures, licensing guidance, and databases to track misadministrations and other information.
3. During September 1993, the staff received Commission approval of the MMP and distributed SECY-93-244 to all Agreement States for discussion at the October 1993 All Agreement States meeting. At this meeting, Office of Nuclear Material Safety and Safeguards (NMSS) management solicited information from representatives on existing Agreement States' requirements and licensing and inspection guidance to be considered by NRC staff when revising its guidance. States were requested to provide NMSS with copies of their medical regulations.

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4. Since April 1993 to present, Agreement States' representatives have provided input to NRC staff for development of a NUREG to provide guidance for NRC and Agreement State licensees on effective management of radioactive material safety programs at medical facilities. The NUREG is included in the MMP and is expected to be published later this calendar year.

Some action items described in the MMP may have significant impact on Agreement States, while others have none. The staff will involve representatives of Agreement States in an early and substantive fashion in changes to NRC's regulatory program which may affect them. In fact, SECY-93-244 commits NRC resources for the coordination of workshops and meetings for this purpose.

**Original signed by
James M. Taylor**

James M. Taylor
Executive Director
for Operations

cc: SECY
OCA
OGC
OPA