

Forbes Health System
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(Req Guide)

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DEPT OF SECRETARY
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BRANCH

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

ATTENTION: Docketing and Service Branch

RE: Draft Regulatory Guide and Value/Impact Statement

Qualifications for the Radiation Safety Officer in a Large Scale Non-Fuel-Cycle Radionuclide Program.

The Radiation Safety Committee of Forbes Health System, Pittsburgh, Pennsylvania, has discussed the above "Draft Regulatory Guide" on several occasions. We are in agreement with the principle of stating the necessary qualifications for a Radiation Safety Officer for a Large Scale Non-Fuel Cycle Radionuclide Program. However, we are concerned about to whom this policy would apply. We would request a more precise definition of a "Large Program" be made in regard to a hospital setting. The smaller community-type hospitals may be adversely affected by too stringent requirements for a Radiation Safety Officer. Perhaps a more finite definition of a "Large Program" could be cited, e.g., license category (Broad, Institutional, etc.). If all hospitals were required to have a Radiation Safety Officer with the proposed requirements, it would not be inconceivable that there might well be a shortage of qualified Radiation Safety Officers. It would also be detrimental to cost containment programs for small and medium sized hospitals with institutional licenses to employ a full-time on-site safety officer. We therefore would urge you to be more specific in your Guide as to what programs would of necessity require such expertise as you propose, and as to how smaller programs may be exempt. We would also inquire about an effective date and the possibility of a "grandfather clause".

Sincerely,

Stephen R. DeLong

Stephen R. DeLong, M.D.
Chairman, Radiation Safety Committee
Forbes Health System

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Acknowledged by card. 10/22/82 emp