



CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU Karl Fischer, Health Physicist	DATE OF CONTACT 5/19&20/2020	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE
E-MAIL ADDRESS 1239kipke/cssb	TELEPHONE NUMBER (734) 834-2773	<input type="checkbox"/> INCOMING <input type="checkbox"/> OUTGOING
ORGANIZATION The Regents of the University of Michigan	DOCKET NUMBER(S) 030-01988	
LICENSE NAME AND NUMBER(S) The Regents of the University of Michigan License No.: 21-00215-04	MAIL CONTROL NUMBER(S)	
SUBJECT Conversation Record regarding information of the licensee's exemption request for 10 CFR 35.610(d)(2)		
SUMMARY AND ACTION REQUIRED (IF ANY) The licensee shared an NRC document titled, "Frequently Asked Questions About Licensing Medical Uses of Byproduct Material Under Revised 10 CFR 35". The document states, "Use of the word "annual," as it appears in Part 35 is usually associated with the frequency with which a function must be performed. For example, Section 35.310 requires licensees to provide radiation safety instruction annually. While there is no definition of "annual" in Part 35, NRC staff looks to other Parts of 10 CFR in order to implement the requirements of Part 35. The staff used the definition of "annual" as it appears in Section 36.2. The definition of "annual" in Section 36.2 is: 1) at intervals not to exceed 1 year or 2) once per year, at about the same time each year, plus or minus one year (calendar) month." The licensee used the definition of "annual": at intervals not to exceed 1 year, or once per year, at about the same time each year, plus or minus one (calendar) month." As such, the licensee had not violated 10 CFR 35.610(d)(2). In addition, the licensee requested exemption of 10 CFR 35.610(d)(2) due to COVID-19.		
NAME OF PERSON DOCUMENTING CONVERSATION Bob Gattone		
SIGNATURE	DATE OF SIGNATURE	
(Empty space for signature and date)		