

65 FR 70742
Nov. 27-2000
①

AMRSO

Academic & Medical Radiation Safety Officers

November 22, 2000

Chief Rules and Directive Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Reference: NUREG-1736, "Consolidated Guidance About Materials Licenses - Consolidated Guidance: Standards for Protection Against Radiation in 10 CFR Part 20 - Draft Report for Comment"

RECEIVED
NOV 27 11 25 3
RADIATION SAFETY OFFICERS

Gentlemen,

I am writing this comment on the referenced publication on behalf of the Academic and Medical Radiation Safety Officers group (AMRSO). The AMRSO is an informal organization composed of over 200 health physicists at over 175 institutions. Members are intimately involved in their institutions' radiation safety programs and nearly all AMRSO members are responsible for these programs. This letter reflects the consensus of AMRSO members in this matter, a matter that concerns us and may have a significant impact on our institutions. Please note that the opinions expressed in this letter are our individual opinions as professional health physicists. They are not intended to reflect the positions of our institutions, either singly or collectively. Specifically, these opinions do not represent those of the Denver VA Medical Center, the Department of Veterans Affairs, or the United States Government.

I received the referenced publication on November 9, 2000 in spite of the publication date of September 2000. The document in soliciting comments reads, "Please submit comments within 90 days of the draft report's publication." Assuming that the time it took me to receive the publication is average, most people will have only 50 days in which to comment. Anyone requesting a copy and receiving it by mail will have 10 to 14 days less time in which to review it and submit comments. This document is about 350 pages long and affects every NRC licensee and most agreement state licensees. Because of this, the AMRSO group feels even the original 90 days is an insufficient time to conduct a thorough review and to submit considered comments and that this problem is exacerbated by the unavoidable delay imposed by distributing them by mail. We feel that, otherwise, it will be difficult for interested licensees to provide the considered feedback that is the purpose of having a review period.

The Nuclear Regulatory Commission's [NRC] guidance documents are of great importance as they are one of the primary sources of procedures for incorporation into license applications. NRC license reviewers will accept a reference to a model procedure in lieu of licensee-developed procedures. While this document does not appear to have model procedures, its guidance may be referenced and cited to support procedures prepared by licensees of both the NRC and agreement states.

Template: ADM-013

E-RIDS-ADM-03
Call-C. Brown (EXB)

AMRSO Academic & Medical Radiation Safety Officers – NUREG-1737 - November 22, 2000

We feel that everyone's interests are best served by having solid guidance in which both the NRC and the regulated community have confidence, that provides a strong assurance of safety, and that does not impose a needless burden on the licensee. It is for this reason that we request that the Nuclear Regulatory Commission extend the official comment period for the referenced publication to March 31, 2001.

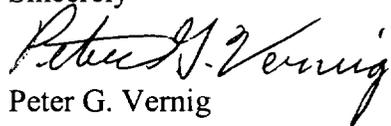
Questions concerning this request or the AMRSO group may be addressed to:

Mr. Andrew Karam, Spokesperson,
University of Rochester Medical Center,
601 Elmwood Ave. Box HPH
Rochester, NY14642,
andrew_karam@urmc.rochester.edu;
716-275-0565.

or to myself:

Mr. Peter G. Vernig,
VA Medical Center,
1055 Clermont St.,
Denver CO 80220;
peter.vernig@med.va.gov;
303-399-8020, ext. 2447.

Sincerely



Peter G. Vernig

CC: Andrew Karam

Attachments: List of AMRSO members

AMRSO

Academic & Medical Radiation Safety Officers

MEMBERS

Steven Alford
Dana Farber Cancer Inst.

George Anastas
California State Univ.

Catherine Anderko
Penn State, Geisinger Med. CTR

Victor Anderson
University of California, Davis

Robert Anger
Clarian College

Sean Austin
NIH

Ronald Avedisian
California State University, Fresno

Daniel Baker
Carnegie Mellon University

Aggie Barlow
Yale University

Tom Battaglia
Buffalo State University

Joel Baumbaugh
Naval Ocean Systems Command

Tad Blanchard
NASA – Goddard Space Flight Center

Joseph Blechinger
Sinai Samaritan Hospital

Eric Boeldt
Penn State

Mike Bohan
Yale-New Haven Hospital

Lisa Bosworth
University of Utah

Philip Bourland
Texas A & M

Mark Bower

Jayne Bray
Creighton University

Roger Broseus

Ronald Bresell
Univ. Wisconsin

Kevin Buckley
Boston University

Tom Budd
St. Lawrence University

Mike Burba
University of Cincinnati

Liz Carey

Keith Carsten
University of Arizona

Bob Casparius
Albert Einstein Medical College

Al Castellane
Oregon Health Sciences Univ.

Frank Castronovo
Brigham and Womens Hosp.

Warren Church
University of Massachusetts, Lowell

Norman Cohen
New York University School of Medicine

Karen Colucci
Albert Einstein School of Medicine

Steve Conatser
John D. Dingell VA Medical Center

Gerald Connock
SUNY Upstate Medical University

Dan Corti
University of Montana

Nelson Couch
North Carolina State University

Greg Crouch
University of Indiana

AMRSO - Academic & Medical Radiation Safety Officers - Members

Dave Derenzo
Univ. Illinois at Chicago

Ken Douglass
West Virginia University

Mark Driscoll
University of Michigan

Rose Duffield
College of Medicine at Peoria

Jason Dunavant

Sue Dupre
Princeton University

P. J. Early

Eric Eastwold
University of Minnesota

Jennifer Ehlert

Don Elting
University of Oregon

Kristin Erickson
Michigan State University

Victor Evdokimoff
Boston University

Robert Fairchild
Nebraska Wesleyan

Rainier Farmer
Oregon State University

Steve Farmer
Purdue University

Gerald Feldman
University of California, Irvine

Bill Fendt
University of Delaware

Kevin Ferguson
St. Louis University

Robert Forrest
University of Pennsylvania

Ian Fraser
University of Waterloo

Steve Frey
Stanford Linear Accelerator Center

Walter Furr
VA Medical Center, Durham

Frank Gallagher
University of California, Irvine

Rudene Gerber

Stephen Giebel
NASA - GSFC

Cal Glisson
Loma Linda University Medical Center

Betty Goetz
Emory University

Shawn Googins
NIH

Karin Gordon
University of Manitoba, Canada

Rao Goriparthi
Fred Hutchinson Cancer Research Center

Martin Graham
Cornell University Medical School

Joe Graves
University of Iowa

Mark Haenchen
St. Louis University

Steve Hand
University of Maryland

Mark Hanlon
New Children's Hospital, Australia

Tom Harrison
Univ. North Texas

Marcia Hartman
University of California, Davis

Tom Hasselbacher
Boston University

Ken Helm
University of California, San Diego

AMRSO - Academic & Medical Radiation Safety Officers - Members

Margaret Henzler
Genesse Hospital

Jim Herrold
University of Wyoming

Ellen Hochheiser
University of Arizona

Mark How
Stanford University

Leah Hoy
University of Texas, Arlington

Scott Hudson
Madigan Army Medical Center

Barry Ivo
Mt. Sinai Hospital, Ontario

Ninni Jacob
Brown University

John Jacobus
NIH

Alan Jackson
Henry Ford Hospital

Mary Ellen Jafari
Western Radiological Physics

Peter Jenkins
Loma Linda University Medical Center

Craig Jensen
Battelle Memorial Institute

Myung Chul Jo
University of Nevada, Reno

Terry Johnson
George Washington University Medical Center

James Kane
Southern Illinois University

Andrew Karam
University of Rochester

Ken Kerns
Iowa State University

Stuart Kline
Cleveland Clinic

Deb Koch
Rochester General Hospital

Catalina Kovats
Georgetown University

Joyce Kraimer
Armed Forces Radiobiology Research Institute

Greg Krause
University of North Dakota

Kent Lambert
Drexel University

Steven Landgraf

Wayne Landowski

Sue Langhorst
University of Missouri

Venkata Lanka
Univ. Medicine & Dentistry of New Jersey

Kaye Larson

Gerald Laurence

Michael Lemon
University of Kansas

Mark Linsley
Penn State University

Lydia Litinski
University of Missouri

Tom Long
Univ. Maryland

Jose Lopez
Univ. Texas, So. Western Med. CTR

William Lorenzen
Boston Children's Hospital

George MacDurmon
Univ. Oklahoma Health Sci. CTR

Mark Martz

AMRSO - Academic & Medical Radiation Safety Officers - Members

Susan Masih
University of Missouri-Kansas City

Frank Masse
MIT

Steve Mattmuller
Kettering Medical Center

Mark Mays
Wright Patterson Air Force Base

James McCumber
Syracuse University

Patrick McDermott
Rutgers University

Tom McGriff
Cornell University

Jeanne McGuire
Ohio State University

Dan Menchaca
Texas A&M University

Brian Methé
St. Peter's Hospital

Rene Michel
University of California, San Diego Medical Center

Dan Miron
VA Medical Center, Milwaukee, WI

Tom Mohaupt
Wright State University

John Moore

Vicki Morris
University of Cincinnati

Matty Mozzor
New York Medical College

Ralph North

Ed O'Connell
SUNY, Stony Brook

Leona Page
University of Manitoba

Nelson Perry
University of Southern Alabama

Bob Peterson
Ohio State University

Roland Phillips
VA Medical Center, Decatur, GA

John Pickering
San Jose State University

Edward Pombier
University of Miami

Harold Prussia

P.Sridhar Rao
Case Western Reserve University

Nand Relann
Univ. Hosp. and Med. CTR, SUNY at Stony Brook

Sylvia Revell
Univ. Texas, So. Western Medical Center

Mack Richard
Indiana and Purdue Universities in Indianapolis

Joseph Ring
Harvard University

Denis Rinkacs
Carnegie Mellon University

Debbie Robinson
University of Chicago

Scott Rone
Ole Miss

Bob Ryan
Renssaler Polytechnical Institute

Greg Sackett
University of Maryland

Riad Safadi
University of Colorado, Health Sci. CTR

Irene Sakimoto
University of Hawaii

William Salisbury

Bill Schadt

AMRSO - Academic & Medical Radiation Safety Officers - Members

Dave Scherer
University of Illinois, Urbana-Champaign

Betty Schwab
Virginia Commonwealth Univ./Med. Col. of Virginia

James Schweitzer
Purdue University

Bob Scott
Roger Williams Medical Center

David Sedwick
Case Western Reserve University

Karen Sheehan

Dave Simpson
University of Nebraska, Lincoln

Jeff Slawson
University of Buffalo

Paul Skierkowski
Oklahoma University

Ronald Slade
Boston University

Richard Smart
University of New South Wales, Australia

Ken Smith
University of California, Santa Cruz

Warren Snell

Julia Sober
Northern Illinois University

Scott Sorensen
St. Lukes Hospital

Lois Sowden-Plunkett
University of Ottawa

Jerome Staiger
University of Minnesota

Tammy Stemen
Yale University

John Stephens
Univ. Colorado Health Sciences CTR

Warren Sterken

Stephen Steuterman

Mary Svoboda
Oakland University

Joe Takahashi
UCLA

James Thompson
University of Utah

Dick Trim
University of Oklahoma Health Sciences Center

Mark Tucker
McMaster University, Canada

Dave Turkow
Rochester Institute of Technology

Vicky Tygart
University of Mississippi

Bala Vaidy

Peter Vernig
VA Medical Center, Denver

Joe Vilani
University of Buffalo

Heidi Voelk
Albany Medical College

Kees Vos
University Hospital Utrecht

Vashek Vylet
Duke University

Rod Warren
University of California Berkeley

Kristin Waterstram-Rich
Rochester Institute of Technology

Alan Watts
Ohio University

Sue Weiss

Beth Welmaker
Princeton University

AMRSO - Academic & Medical Radiation Safety Officers - Members

John White
University of Texas

David Wiik
University of Southern Alabama

Bob Wilson
University of Kentucky

Bill Wright
Texas Technical University

Shirley Xu
University Hospital of Cleveland

Terry Yoshizumi
Duke University

Robert Yoss
Froedtert Mem. Lutheran Hosp. & Med Col. of
Wisconsin

Frank Zaldivar

Winnie Zhu
Cleveland Clinic

Robert Zoon
NIH

John Zummo
University of California, San Diego

Please note: AMRSO Members without an organizational affiliation either work independently, declined to give an affiliation when joining or requested that it not be used in position statements such as this.