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their own training and experience credentials and day-to-day radiation safety operating procedures, and simply certify in the application that the requirements had been met.

At a public meeting on that proposal, however, some NRC staff and representatives of the Agreement States expressed concern over the potential hazard of safety problems that, under the current application review system, are brought to light and resolved in the licensing process. (An Agreement State establishes its

own licensing requirements and procedures under an agreement with the NRC.)

The NRC Commissioners directed the staff to revise the proposal to continue preclicensing review of physicians' credentials and applicants' operating procedures. The proposed revision, therefore, retains the current application process under which the entire radiation safety program is described, but allows licensees to make minor changes in their radiation safety programs. (Major changes that require an amendment are: new

authorized users, new types of use, increased possession limits, and new locations of use; all other changes are, by tacit definition, minor.)

This revision of the regulatory process should reduce NRC medical licensing items by about 30 percent.

Although it will not relieve licensees of the paperwork burden associated with minor amendments because an internal approval process is required, it will avoid the lengthy turnaround time associated with license amendments, and the amendment fee.

