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CORRESPONDENCE CONTROL TICKET

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Appropriate Action

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AFFILIATION: ACC

ADDRESSEE: Richard Meserve

SUBJECT: Implementation of training and experience requirements-
10 CFR Pt 35

ACTION: Appropriate

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January 25, 2002

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The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
One White Flint North Building
11555 Rockville Pike
Rockville, MD 20852

Re: Implementation of Training and Experience Requirements

Dear Chairman Meserve:

The American College of Cardiology and the American Society of Nuclear Cardiology support the NRC's revisions to 10 C.F.R. Part 35, as adopted on October 23, 2000. We believe the NRC was diligent and thorough in soliciting the input of affected and interested parties during its rulemaking process. The final rule reflects a thoughtful balance between the costs and benefits of regulating diagnostic nuclear medicine.

The cardiology community's major interest in the revised 10 CFR Part 35 lies in the modifications made in the training and experience requirements. We believe the new standards are far more realistic for training nuclear cardiologists as authorized users.

Despite a lengthy and thorough rulemaking process, opponents of the revisions to 10 C.F.R. Part 35 convinced the Senate to adopt a year-long ban on the implementation of the new rule. After the cardiology community voiced its objections, Congress enacted legislation allowing implementation of the training and experience requirements while directing the NRC to report to Congress by January 31, 2002 why the regulatory "burden" on the use of nuclear diagnostic medicine cannot be further reduced.

We urge the commission to use the authority granted by Congress to place the training and experience requirements in effect as soon as possible. Any further delay in the implementation of the new training and experience requirements will affect improved access to nuclear cardiology training and the delivery of nuclear cardiology services that the new rule will permit in a safe environment.

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Honorable Richard A. Meserve, January 25, 2002, Page Two

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We support 10 C.F.R. Part 35 as promulgated by the NRC and hope that the commission will use the authority granted by Congress to implement the training and experience requirements as promptly as possible.

Sincerely,

Douglas P. Zipes, MD, FACC
President, American College of Cardiology

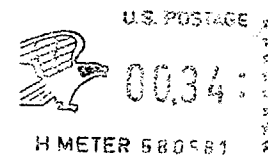
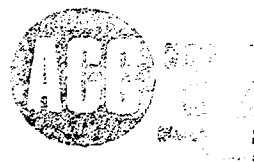
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