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OFFICE
RULE
ADJUDICATED

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The Honorable Greta J. Dicus
Chairwoman
US Nuclear Regulatory Commission
016C1
Washington, DC 20555

Dear Chairwoman Dicus:

I have just learned of the NRCs recommendation that endocrinologists be required to increase their training and experience requirements to 700 hours for purposes of being able to use iodine-131 for patients with thyroid disease. This rule change seems so unreasonable that at first it seemed to me to be a mistake. The facts are that endocrinologists have been using I-131 for many years, that endocrinologists developed the use of I-131 for the treatment of thyroid disease, and at one time were the only people using it, and that the only misadministrations have occurred at the hands of the very people that this rule is seemingly made to protect—that is the nuclear medicine specialty. It is clear that the changes in this rule have nothing to do with patient care or effective treatment. Endocrinologists treat a wide range of thyroid disease, thyroid cancer, and hyperthyroidism being those disorders in which we have the most experience. In fact, the nuclear medicine subspecialty never does diagnosis or manage thyroid disease except to provide patients with isotope.

I hope you will recognize the recommendations behind this rule change as representing a turf war rather than something that actually will be a benefit to sick people. I would strongly urge you to reconsider this rule change, and that you allow those of us who have great experience and interests in the treatment of thyroid disease to continue to do so.

Sincerely,

Stephen F. Hodgson, MD

SFH/bkz