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March 23, 1998

Dr. Shirley Ann Jackson, Chairman
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

DRAFT

Dear Chairman Jackson:

I understand that the Nuclear Regulatory Commission (NRC) is undergoing a process of revising its regulations to be more risk-based and performance oriented. The part of this process that is of concern to me involves revision of 10 CFR Part 35, which applies to the medical use of radioisotopes. While I support the direction in which the commission is moving, some of my constituents in the radiology community are concerned about the trend that is reflected in early drafts of the revisions of part 35 relating to the training and experience necessary to become licensed to use radioisotopes diagnostically.

The record of safe usage of radioisotopes compiled over many years under NRC Licensure is a very good one. I and my constituents are concerned that, with the severe reductions in required training and experience under 10 CFR Part 35.100, 200, and 300 that are being considered, this record of safe usage will end and more incidents that jeopardize patient care will occur. I urge you, as leader of the Commission, to consider carefully the implications of the proposal that the NRC staff is preparing for your approval. We believe that patient care would best be served if the training and experience requirements were revised as recommended in comments submitted to the NRC staff by the American College of Radiology (copy attached). It would be unfortunate to move too far in a direction that jeopardizes patients in the name of a more forward looking regulatory process.

We would be glad to discuss these comments in detail if you desire.

Sincerely yours

Senator or Representative