

ARKANSAS DEPARTMENT OF HEALTH AND HUMAN SERVICES  
RADIOACTIVE MATERIALS PROGRAM  
RADIATION CONTROL SECTION

DOCKETED  
USNRC

July 17, 2006 (2:26pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
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COMMENTS

Notice of William Stein's Petition for Rulemaking for Comment  
STP-06-061

The Department would like to thank the Nuclear Regulatory Commission (NRC) for the opportunity to comment on William Stein III, M.D.'s Petition for Rulemaking.

Comment 1

The Department agrees with the petitioner's comments and conclusions. The administration of the therapeutic radiopharmaceuticals identified by the petitioner pose no greater health and safety risk than oral administrations of greater than 33 mCi of sodium iodide I-131. If the NRC has determined that the qualifications listed in 10 CFR 35.394 provided adequate training and experience for the oral administration of greater than 33 mCi of sodium iodide I-131, similar qualifications should provide adequate training and experience for the administration of Sm-153 Quadramet, I-131 Bexxar, and In-111 and Y-90 Zevalin.

Comment 2

Should the NRC agree with the petitioner and determine that revisions to 10 CFR Part 35 are necessary to address the petitioner's concern, the Department believes Sr-89 Metastron should also be included in the list of therapeutic radiopharmaceuticals requiring training and experience as outlined in 10 CFR 35.394.

Again, the Department expresses its' appreciation to the NRC the opportunity to comment on the petition for rulemaking. If you have any questions please contact:

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Submitted via e-mail to: SECY@nrc.gov

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