

PRM 35-19
(71FR34285)



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STATE OF ALABAMA DEPARTMENT OF
PUBLIC HEALTH

Donald E. Williamson, MD
State Health Officer

August 8, 2006

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August 16, 2006 (11:19am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Petition for Rulemaking from William Stein, III, M.D.
STP-06-061

Dear Sir:

Please accept these comments regarding the above referenced petition for rulemaking.

Dr. Stein rightfully points out that the oral administration of sodium iodide 131 presents more radiation safety hazards than the medical uses he names in his petition.

As a state representative on the Part 35 and training and experience working groups, I stated that oral administrations of sodium iodide 131 present significantly higher radiation health and safety concerns than most other types of uses covered under 10CFR 35.300. I continue to disagree with the current NRC rules. I believe that training and experience requirements for oral sodium iodide 131 administrations should require the full 700 hours and 3 supervised cases specified in 35.390, and not be given special status.

However, because of the NRC's current rules, I must agree with the petitioner's comments and conclusions. The chemical forms, routes of administration, biocompartmentalization and routes of excretion for radiopharmaceuticals such as Zevalin, Bexxar, Quadramet and Metastron contribute to lowering the radiation health and safety risks associated with their use. I believe these radiopharmaceuticals present fewer health and safety hazards than oral sodium iodide 131.

Thank you for the opportunity to comment on this rulemaking petition.

Sincerely,

A handwritten signature in cursive script that reads "David Walter".

David Walter, Director
Radioactive Material Licensing
Alabama Office of Radiation Control

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