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August 29, 2006 (4:29pm)

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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attention: Rulemaking and Adjudications staff

Re: Comments to Petition for Rulemaking Submitted by Dr. Stein, Docket No. PRM-35-19

I strongly support The Petition for Rulemaking (PRM) submitted by Dr. Stein (PRM-35-19) requesting that the NRC amend its regulations to recognize that an 80-hour training and experience requirement is appropriate and sufficient for medical oncologists/hematologists to attain AU status for the administration of Quadramet, Bexxar, and Zevalin. Each of these activity administrations is from a radiation safety perspective generally much less hazardous than oral ^{131}I administrations. The NRC has already stipulated and codified that any physician, most notably endocrinologists, can administer oral Na^{131}I to treat thyroid disorders with only 80 hours of classroom and laboratory training (as well as appropriate work experience and written attestation). Administration of the agents specified in the petition is therefore, a medical issue rather than a radiation safety issue. I recognize that the petition refers only to activity administrations; any related imaging studies that may be required would obviously have to be performed by an appropriately authorized user, unrelated to the granting of this petition.

I believe therefore that unless this petition is granted expeditiously, the NRC will be intruding into the practice of medicine and unfairly discouraging a class of physicians from treating their patients; thus, limiting patient access to potentially very effective therapies and increasing health care costs without any appropriate radiation safety justification.

Sincerely,

Robert M. Kessler, M. D.

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