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CareAlliance

ROPER HOSPITAL

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October 24, 2008

Annette L. Vietti-Cook
Secretary of the Commission
U.S Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Fax: 301-415-1101

Re: Mary Decker

Dear Mrs. Vietti-Cook:

Attention: Rules-Making and Adjudication Staff

My name is Mary Decker. I am a practicing radiation oncologist. I have been in practice 20 years in Charleston, South Carolina, in a community hospital setting. I have been doing brachytherapy implants for the last 10 years, primarily prostate. I am very concerned about amendments/medical event definitions RIN 3150-AI26 NRC 2-2008-0071. To establish the medical event criteria and written directive requirements for permanent brachytherapy implants would result in some implants which are medically acceptable being categorized as medical events. Since we do real-time implants, it is difficult to always have the written directive coincide exactly with the final implant. Implants are based on the volume determined during the procedure which, during prostate seeding in our case, would be ultrasound. The pre-implant volume is determined by CT scan, which notoriously can overestimate the volume. Implants constantly need to be tailored to the patient during the intraoperative planning process. I support ASTRO's suggested revisions to the proposed regulations. I believe these modifications will clarify the source strength implanted as stated in written directive, which refers to the source strength implanted after administration but before the patient leaves the post-treatment recovery area.

Sincerely yours,

Mary Decker, M.D.

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