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May 22, 2009

Robert J. Lewis
Director, Division of Materials Safety and State Agreements, FSME
Nuclear Regulatory Commission
Mailstop 8 F24
One White Flint North Building
11555 Rockville Pike
Rockville, MD 20555

RE: Full Membership on ACMUI for a Diagnostic Radiologist

Dear Mr. Lewis:

On behalf of the American Board of Radiology (ABR), we are writing to request that NRC elevate the current position of diagnostic radiology consultant to the Advisory Committee on the Medical Uses of Isotopes (ACMUI) to full member status.

As you are aware, there are substantive current and evolving circumstances in which the diagnostic radiology community and NRC must interact to assure both safety of our patients and their access to state-of-the-art diagnostic and therapeutic techniques provided by radiologists. Over the past year, Dr. Mickey Guibertau has served as a diagnostic radiology non-voting consultant to ACMUI with the support of major radiological professional societies representing practicing diagnostic radiologists. As such he has been able to add the much needed perspective of the diagnostic radiology community to ACMUI's deliberations on existing issues as well as to broach new topics of particular concern. In particular, his input has greatly added to the Committee's understanding relative to Part 35 Training and Experience requirements as it impacts diagnostic radiologists, Authorized User (AU) status for use of Yttrium-90 (Y-90) Microspheres by interventional radiologists, and changes in the ABR Certification process affecting the Board Certification pathway to AU status. The ABR consider these vitally important topics that will remain before the ACMUI for months and years to come.

It is apparent to the ABR as well as to the broader diagnostic radiology community that both NRC and diagnostic radiology may be better served by an Advisory Committee which includes formalized representation of the more than 30,000 diagnostic radiologists practicing in the United States. Further, the ABR has received substantial feedback from ACMUI members and other stakeholders recognizing the positive value of diagnostic radiology's contribution to the ACMUI's deliberations. Therefore, the ABR respectfully requests that the NRC proceed with elevating the status of the diagnostic radiology consultant's role to a formal, full-time membership position on the ACMUI.

We do understand that there are established procedures for adding formal positions to the ACMUI. If the ABR can supply any additional information to NRC staff and the Commission in support of this request, please do not hesitate to contact us.

Sincerely,

Gary J. Becker, M.D.
Executive Director

N. Reed Dunnick, M.D.
President

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