



RULES AND DIRECTIVES
BRANCH
10/20/10

TARGETING CANCER CARE 2011 FEB 19 PM 1:42

February 17, 2010

Electronically Submitted VIA: www.regulations.gov

RECEIVED

Cindy Bladey
Chief, Rules Announcements and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Mail Stop: TWB-05-B01M
Washington, DC 20555-0001

(4)

10/20/10

75FR 64749

Re: Comments on the Use of Electronic Signatures for NRC Documents Related to the Medical Use of Byproduct Material Maintained at Licensees' Facilities [Docket No. NRC-2010-0330, See 75 FR 64749 (October 20, 2010)]

Dear Ms. Bladey,

The American Society for Radiation Oncology (ASTRO) appreciates the opportunity to provide comments to the U.S. Nuclear Regulatory Commission (NRC) on the use of electronic signatures for NRC documents related to the medical use of byproduct material maintained at licensees' facilities. ASTRO commends the NRC for soliciting stakeholder input prior to making a final decision on this matter.

ASTRO is the largest radiation oncology society in the world, with more than 10,000 members who specialize in treating patients with radiation therapies. As the leading organization in radiation oncology, biology and physics, the Society is dedicated to improving patient care through education, clinical practice, advancement of science and advocacy.

As the practice of radiation oncology and all of medicine moves towards the full implementation and meaningful use of electronic health records and therefore, electronic signatures, ASTRO advises the NRC to ensure that requirements promulgated by the NRC be consistent with those requirements being proffered by other agencies, such as the Department of Health and Human Services (HHS) and the Centers for Medicare and Medicaid Services (CMS). Without full harmonization across the various federal systems and requirements on electronic signatures, we are concerned that unnecessary burdens could be placed on health care providers. In addition to ensuring that the content of the electronic signature regulations is consistent with those regulations being promulgated by other agencies, we ask that NRC ensure consistency in the timing of those regulations. Inconsistent implementation dates related to electronic signatures could result in confusion among physicians in their effort to comply.

Thank you for affording ASTRO the opportunity to provide comments on the use of electronic signatures for NRC documents related to the medical use of byproduct material maintained at licensees' facilities. As one of the leading physician specialties in both the medical use of radioactive materials and the use of health information technology, we would like to serve as a resource to the NRC as it continues

SUNSI Review Complete

E-RIDS = ADM-03

AMERICAN SOCIETY FOR RADIATION ONCOLOGY

8280 WILLOW OAKS CORPORATE DRIVE • SUITE 500 • FAIRFAX, VA 22031 • 800.962.7876 • 703.502.1550 • FAX: 703.502.7852

Template = AD 01-013

www.astro.org • www.rtanswers.org

add = A. Cocherham (qntd)

February 17, 2011

ASTRO Comments on the Use of Electronic Signatures for NRC Documents Related to the Medical Use of
Byproduct Material Maintained at Licensees' Facilities

Page 2

its important work on this issue. Please contact Cindy Tomlinson, Manager of Regulatory Affairs at
703-839-7366 or cindy@astro.org if you have any questions.

Sincerely,



Laura I. Thevenot
Chief Executive Officer

CC: Ashley Cockerham, Office of Federal and State Materials and Environmental Management
Programs