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NUCLEAR MEDICINE, LTD.

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PROPOSED RULE PR Misc. Notice  
Reg. Guide



Secretary of the Commission  
U.S. Regulatory Commission  
Washington, D.C. 20535

Attention: Dockets and Service Branch

Gentlemen:

The change in license requirements for physicians limiting their use of radio-isotopes to nuclear cardiology is unwise in my opinion. The change requested by cardiologists would create problems at a time when there is much concern over radiation safety. Certainly no short cut approach to training can replace the education necessary for personnel using Nuclear Medicine no matter what area of specialization they serve, let alone one which is highly visible and in the public eye.

In my experience I have seen cardiologists produce training films which are problems in that they demonstrate undesirable handling techniques of radionuclides.

The following list of reasons for avoiding subversion of an orderly and detailed Medical Training Process includes:

- Lack of Radiation Safety
- Errors in dose
- Quality control of pharmaceuticals
- Undesirable radiation exposure
- Poor definition of who can use radionuclides
- Poor cost containment

Sincerely yours,

*Alan S. Lieberthal*  
Alan S. Lieberthal, M.D.

ASL/sr

Acknowledged by card... 8/21/79

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