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NORTH MEMORIAL MEDICAL CENTER

3220 LOWRY AVENUE NORTH
MINNEAPOLIS, MINNESOTA 55422
AREA 612 / 588-0616

December 5, 1979



U.S. Nuclear Regulatory Commission
Washington, D C 20555

Dear Commissioners:

In response to your correspondence of the past several weeks, we wish to reaffirm our continuing policy of operating our clinical nuclear facilities in such a way as to minimize radiation doses to patients, technologists, and other personnel.

We are currently studying your Model Program for Maintaining Occupational Radiation Exposures at Medical Institutions ALARA. We are also assessing the impact of Regulatory Guides 8.10 and 8.18 on our program.

The Administration and Medical Staff of North Memorial Medical Center have always strived to keep potential radiation exposure as low as practicable, or in current parlance, ALARA. We feel we have had notable success, and our efforts are continuing. Nevertheless, Medical Center Management is extremely concerned that the suggested Model Program will add considerable administrative costs to the nuclear medicine program at this institution.

Historically, our radiation safety procedures have developed in response to the specific needs and requirements of our particular nuclear medicine program. That is, we have tailored the safety program to the limited nature and extent of our usage of radioactive materials. Our Radiation Safety Officer (RSO) is attempting to formulate an economical ALARA program which will meet or exceed all NRC requirements, but he has already indicated that the RSO can no longer be an uncompensated volunteer from the Radiology staff. The position will require, at the least, a part-time salaried physicist.

The nuclear medicine facility at North Memorial Medical Center is quite small. Our Radiation Safety Officer closely monitors compliance with all applicable safety regulations, and he is charged with the responsibility of minimizing all health and safety risks. He has succeeded admirably in these tasks. Your Model Program would now impose extensive new procedures for safety review and would add dramatically to the costs of our nuclear medicine program. In a small clinical facility, the imposition of these safeguards seems hardly justified from either a health or economic standpoint.

Acknowledged by card.....

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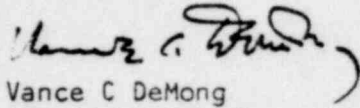
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We commend your efforts in the area of radiation safety, and we appreciate your attention to our concerns. We look forward to your comments.

Very sincerely,



Vance C DeMong
President



William A Wilcox, MD
Radiation Safety Officer

VCD/WAW:kaj

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