

D.A. BERGERON, M.D. F.A.C.P. P.C.
INTERNAL MEDICINE • NUCLEAR MEDICINE
717 ST. FRANCIS
TELEPHONE AC 605/348-3870
RAPID CITY, SOUTH DAKOTA 57701

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OFFICE OF THE SECRETARY
PROPOSED RULE # 174 -35(4)FR 21623



Secretary of the Commission
U.S. Nuclear Regulatory Commission

May 11, 1979

RE: PROPOSED RULE # 174 -35(4)FR 21623

Dear Sir,

I have received your proposed rules on the new radiation safety committee. I find that, in actuality, you will be enlarging most committees in the smaller hospitals, rather than decreasing membership. You will also be putting on at least two or three people who have no knowledge of radiation, and who will be more of a hindrance than a help in the management of radiation, and the use of radioactive materials.

I see that you also want to require the addition of some person from the nursing staff, and some person from the management of the institution. This certainly will add nothing to the requirement for the use of radioisotopes in most smaller hospitals. Numerous regulations at the present time prevent the use of these in any but the most approved situations, such as standard liver/lung scans, etc.

I feel that at the present time, our committee which consists of a Pathologist, a physician trained in Internal Medicine and Nuclear Medicine, and the Radiation Therapist certainly is an adequate committee. I also feel that this committee could be added to very little by the inclusion of these other individuals. A small group certainly is much more flexible and easier to get together than is a large group; and has much more interest when it consists of those individuals who are directly involved in radiation than does a group consisting of persons with almost no knowledge, and no involvement in the use of these materials.

My biggest complaint, however, is that conceivably you could force us to expand our radiation safety committee to approximately five people, minimum, and if all departments are included, up to as many as ten individuals. I have difficulty in understanding how this would simplify anything, and also in how this would implement or improve our present conditions.

Sincerely,

D.A. Bergeron
D.A. BERGERON, M.D.

Administrated by coord. dm 5/22

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