



OH 723-Y
Broosly

Sebastian River
Medical Center

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PROPOSED RULE PR-Misc. Notice
Reg. Guide

July 31, 1979

POOR
ORIGINAL

Secretary of the NRC
Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Dockets and Service Branch

Dear Sir:

This letter is to protest a recent change in Regulatory Guide 10.8, "Preparation of Applications for Medical Programs", appendix A, acceptable training for medical use of by-product material.

As a physician practicing nuclear radiology and general diagnostic radiology I feel it is a most unwise decision by the NRC to permit a lowering of training requirements in the safe handling and use of radioactive materials as the commission has recently done in regards to nuclear cardiology.

The isolated 3 months of training outside of an organized training program for use of radioactive materials will certainly not provide the level of training and degree of experience now required and will allow greater opportunity for error in dose handling and quality controls of radiopharmaceuticals and gamma cameras by physicians whose background training and experience has not been in the use of these materials and equipment.

There is more opportunity for poorer diagnostic skills to lead to undesirable radiation exposure.

A medical training process is already well established by radiology, pathology and nuclear medicine programs, 721328 which has been inspected and approved by the Joint Review Commission leading to Board examination. This process, which assures adequate training and expertise, would be subverted by the NRC action.

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Further, the term "cardiologist" is undefined and it is not clear that those persons licensed will necessarily be board certified cardiologists but may be any physician who chooses to use the term cardiologist.

These diluted licensing requirements will lead to duplication of capital equipment, personnel, and space in some institutions and will not be cost effective. Conversely, equipment in a nuclear medicine department, when not used for cardiovascular nuclear medicine, is used for other purposes.

Sincerely,

W. W. McCorkle M.D.

Walter W. McCorkle, M.D.
Chairman,
Department of Radiology & Nuclear Medicine

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