HOFFMANN-LA ROCHE INC.

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June 15, 1979

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

ATTN: DOCKETING AND SERVICE BRANCH

Gentlemen:

I would like to comment on the proposed change in 10 CFR Parts 31 and 32, regarding the addition of veterinarians to the in vitro general license, which was published for comment in the Federal Register on 4-26-79.

First, I am very much in favor of adding veterinarians to the list which now includes physicians, clinical laboratories, and hospitals. It is a reasonable, logical, and useful change and one which will reduce unnecessary paperwork and is not likely to adversely affect the safe use of radioactive materials.

I recommend additionally, however, that this same thought process be extended to include other categories of persons or institutions which may have equivalent expertise and training regarding in vitro clinical laboratory testing procedures. I have in mind such areas as blood banks (for hepatitis testing), poison control centers, forensic laboratories, and drug abuse clinics.

Also, provisions should be made for suppliers of in vitro reagents to continue to use package labels, leaflets, and brochures which have been printed under the current regulation. I suggest that a one year changeover period be allowed for manufacturers to use up old stocks of labels and brochures, as it would be a very expensive proposition to destroy all existing stocks simply to add the phrase "veterinarians in

the practice of veterinary medicine" to the required statement.

In any event, I urge you to proceed with this worthwhile proposed rulemaking.

Very truly yours,

Wesley R. Van Pelt

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WRVP/jb