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SCHOOL OF VETERINARY MEDICINE
AGRICULTURAL FIELD STATION
DEPARTMENT OF CLINICAL PATHOLOGY

DAVIS, CALIFORNIA 95616

(10)

DOCKET NUMBER
PROPOSED RULE PR-31, 32 (44FR 24570)

May 15, 1979

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

ATTN: Docketing and Service Branch

RE: Inclusion of Veterinarians among those authorized to use by-product materials under general license.

Dear Sir:

As you indicated, veterinarians receive training in radiology and radiobiology at least equivalent to that of physicians and should therefore be considered equally in this regard.

There is one aspect of the proposed new wording which I do not understand. In 31.11 (a) and in (d) (2) the proposed wording reads ...to any physician, veterinarian in the practice of veterinary medicine... This seems to approve any physician regardless of his professional activity whereas veterinarians not in the practice of veterinary medicine would not come under this provision. I can see no reason for this discrimination. Presumably physicians in a strictly research or non-practice position would be treated differently from veterinarians in a similar position.

I hope this discrimination was not intended and that the wording can be changed so that the two professional groups will be treated equally.

Sincerely yours,

DE Jasper

D. E. Jasper, D.V.M., Ph.D.
Professor of Clinical Pathology

Acknowledged by card 6/7 gf

DEJ:dmc

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