

medlab

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*PR - Miss Justice
Reg Guide*

July 24, 1979

chemist

S. STEFAN BJORNSON, M
P. JOHN PEGG, M

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

Attn: Dockets and Service Branch



cytolog

A. CLINTON HEWES, M
FRANCIS P. PARKER, M
JAMES F. REAMER, M

Dear Sirs:

hematolog

JOHN E. BENZEL, M
VINCENT DHOUCA, JR., M
JOHN J. EGAN, M
R. CURTIS MILLS, M
CHARLES M. SMITH, M

I am extremely distressed about the recent change that you have made in Appendix A, Acceptable Training for Medical Use of By-Product Material of Regulatory Guide 10.8, Preparation of Applications for Medical Programs. By affecting this change you have set up a double standard for those individuals wishing to use radioisotopes in different diagnostic categories. Training programs already set up for nuclear medicine physicians encompass at least a year and preferably two years and it seems inconceivable that the same amount of information and education can be instilled in just three months. Also the regulations use the term "cardiologist" rather loosely and it would appear that just anybody who wished to name himself as a cardiologist could then step out into the nuclear medicine field with an inadequate period of training. One other factor of concern is the point that most of the "cardiologists" would be utilizing outside offices. Since I operate both a laboratory in a private office and in a medical center, I readily know that inspections of the private offices are much less frequent than those in the hospital institution setting, and thus, those individuals with inadequate training would be relatively unsupervised by the regulatory inspections because most of them would be away from the heavily inspected areas.

microbiolog

PARK W. HUNTINGTON, M
ROBERT L. KNOWLES, M

In this day and age when the consumer is clamoring for more training and expertise from the individuals from whom they are receiving care, it seems inconceivable to me that we should allow a group to start up with sub-optimum training and further exploit the public.

nuclear medicin

ROBERT L. MECKELNBURG, M
VIDYA V. SAGAR, M

Sincerely,

Robert L. Meckelburg
Robert L. Meckelburg

patholog

PATRICK F. ASHLEY, M
JOSEPH V. CASELLA, M
ROBERT DICKERSON, M

cc: ACNP

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RLM/alb

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Delaware Medical Laboratories, Inc. • (302) 994-5764

1 PIKE CREEK CENTER, WILMINGTON, DELAWARE 19808

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August 10, 1979

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Room 016

FROM: James J. Henry, TPSB:ES:SD

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