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

Attention: Dockets and Service Branch

Commission Secretary:


I am writing to express my displeasure at the recently revised standards, by which you would allow "cardiologists" to practice nuclear cardiology. Although the "imaging" of some of the nuclear cardiology procedures may at first glance appear to be relatively uncomplicated by a cardiologist, it is actually this oversimplified view which portends the greatest potential danger. An extensive amount of technical knowledge and a sound background in nuclear physics unfortunately represent prerequisites which assure high levels of quality control and radiation safety during the production of the final "image". (I use the word "unfortunately", since I too had a somewhat overly simplified impression of the field of Nuclear Medicine during my residency training program, thinking that expertise in the field related merely to the interpretation of the final diagnostic images. It is only now, after several years in private practice, that I am beginning to realize the major importance of the three intensive years of Nuclear Physics and Radiation Safety courses, in dealing with the day-to-day problems which crop up in the practice of Nuclear Medicine.)

In addition, why the "need" to change the previous license requirements. It certainly cannot upgrade the quality of interpretation of these Nuclear Cardiology procedures, and in my experience dating back to university experience with highly competent specialists, even in that setting the best cardiologists were very rarely as competent in interpreting radiographic or Nuclear Medicine images as were the radiologists, who had been specially trained in these areas and who work with imaging procedures in their day-to-day practice of medicine. This may appear to be a strong statement, but by the same token I do not feel that a radiologist can hope to be anywhere near as competent as a cardiologist in using the stethoscope.

*acknowledged by [unclear] 8/14/79*

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Finally, in the first paragraph I purposely used the term "cardiologists" in quotation marks, as that term is undefined. In small towns, and in many places around the country, physicians will refer to themselves as cardiologists without the necessary board certification.

I would like you to review your change of appendix A Acceptable Training for Medical Use of By-Products Material of the Regulatory Guide 10.8, and hopefully eliminate this change.

*Thomas Glynn*

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