

POOR ORIGINAL

VIDYA V. SAGAR, M.D., M.S., F.A.C.P.  
2204 CLEARVIEW AVE.  
WILMINGTON, DELAWARE 19810



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Secretary for the Commission  
Nuclear Regulatory Commission  
Washington, D. C. 20555

Att: Dockets and Service Branch

Dear Mr. Secretary:

I am writing this letter to express my concern over the recent change affecting Appendix A, Acceptable Training for Medical Use of Byproduct Material of Regulatory Guide 10.8, Preparation of Application for Medical Programs. I am opposed to the change for the following reasons:

1. With the public concern of radiation hazards and radiation safety in the wake of "Three Mile Island", it is not appropriate to allow a cardiologist half-trained in radiation safety to apply nuclear cardiology techniques. Performance of a nuclear cardiology study is no different than any other nuclear medicine procedure and hence it is difficult to understand why the particular study should be given a preferential treatment of reduced training period.
2. There are three groups of physicians already competent in the use of radionuclides namely Nuclear Medicine Physicians, Nuclear Radiologists and Radioisotopic Pathologists. It will be a duplication and fragmentation of the specialty to allow a fourth group of physicians to further fragment the field. In addition, the term "cardiologist" is undefined and anybody who claims himself a cardiologist could get a license from the Nuclear Regulatory Commission.
3. As a Nuclear Medicine Physician, I have had two years of residency training which gives you a broad background in the understanding of the radioactive materials and its use. When the regulations and the understanding related to the radioactive material have become more complex, it is inconceivable that a change in the current regulatory standards is appropriate to allow an individual to use radioactive materials with only three months of training.

As a full time practitioner of Nuclear Medicine with a two year residency training in Nuclear Medicine and certified by the American Board of Nuclear Medicine, I strongly object to the change allowing cardiologists to get a license to practice Nuclear Cardiology with only three months of training in the field.

VIDYA W. SAGAR, M.D.

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CC: American College of Nuclear Physicians

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