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PR - *Misc Notice*  
*Reg. Guide*

July 24, 1979



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

Attention: Dockets and Service Branch

Commission Secretary:

I want to express my objection to your newly reduced standard to allow "cardiologists" to practice nuclear medicine cardiology imaging.

This change in license requirement is a competitive standard to those high training standards established by our existing programs in Radiology, Pathology, and Nuclear Medicine. There is considerable "carry over" of knowledge and understanding from one area of Nuclear Medicine imaging to another. "Tunnel vision" specialists will never develop that line of expertise and experience.

In our own institution, all Nuclear Medicine imaging is done by board certified radiologists and under the supervision of a board certified radiologist with special confidence in Nuclear Medicine. Our general purpose instrumentation is used for general imaging and also for Nuclear Cardiology. This is a more efficient utilization of expensive equipment and has its impact on cost containment. We will not have a large volume of Nuclear Cardiology. At the moment, we will not have a competitive "cardiologist" doing Nuclear cardiology. But with this newly reduced standards, I believe that threat may present itself during the next few years as we look for an additional cardiologist.

I request that you review your position on this regulation. It is my request that this reduced standard for Nuclear "cardiologists" be eliminated.

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JCS/lc

Acknowledged by card... *dlh 9/11/79*

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