

ALLEN D. DVORAK, M.D.
9733 Brentwood Road
Omaha, Nebraska 68114

NRC PUBLIC DOCUMENT ROOM

DOCKET NUMBER
PROPOSED RULE PR - *Final Notice*
Reg. Guide

August 3, 1979



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

Attn: Dockets and Service Branch

POOR ORIGINAL

Dear Secretary:

It has recently been brought to my attention that the Nuclear Regulatory Commission has made a change in license requirements for those physicians using radioisotopes. The change which has been brought to my attention in essence states that the NRC has allowed physicians who limit their use of byproduct material to perform diagnostic studies in the field of nuclear cardiology to satisfy their training and experience criteria concurrently in a formal 500 hour (3 months) training program.

This recent change in license requirements appears to be a step backwards from several perspectives. The American Board of Nuclear Medicine which examines in the specialty of nuclear medicine has established a definite training program in the specialty of nuclear medicine. This orderly medical training process in nuclear medicine would be subverted by the NRC action. Also, an isolated 3 month training program would allow for greater opportunity for undesirable radiation exposure to patients. Lastly, a consideration of cost containment in health care must be considered. It is conceivable that in an institution having both a cardiology and nuclear medicine department that there would be unnecessary duplication of technical equipment.

I would appreciate a response as to why this particular action has been taken by the Nuclear Regulatory Commission. Thank you for your attention and prompt response to my inquiry.

Sincerely,

Allen D. Dvorak MD

Allen D. Dvorak, M.D.

Acknowledged by *care*. *d/h 8/10/79*

ADD:sn

cc: American College of Nuclear Physicians

1001 308 9

7909240 754