DOCKET NUMBER
PETITION RULE PRM 35-9
(54 FR 38234)

(28)

RADIOLOGY CONSULTANTS, P.A.

T.J. ROPER, M.D.
J. ARTHUR DUNLAP, JR., M.D.

31 MED'CAL RIDGE DRIVE
CROSS CREEK MEDICAL PARK
GREENVILLE, S.C. 29605
TEL. (803) 271-2157

DIAGNOSTIC RADIOLOGY
NUCLEAR MEDICINE
ULTRASOUND

'89 OCT 23 P4:51

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

October 17, 1989

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Docketing and Service Branch, Docket #PRM-35-9
Washington, DC 20555

Dear Mr. Secretary:

I am writing to express my support for the Petition for Rulemaking filed by the American College of Nuclear Physicians and the Society of Nuclear Medicine. I am a practicing nuclear medicine physician in Greenville, South Carolina. I believe that the revised 10 CFR 35 regulations governing the medical use of byproduct material prevent physicians from providing optimized care to individual patients.

Too many regulations do nothing but confuse the issue and defeat the purpose for which they were intended. Currently, the regulatory provisions in part 35 (35.100, 35.200, 35.300 and 35.17(a)(4)) do not allow practices which are legitimate and legal under FDA regulations and state medicine and pharmacy laws. These regulations, therefore, inappropriately interfere with the practice of medicine, which directly contradicts the NRC's Medical Policy statement against such interference.

I believe that these regulations are unnecessary and interfere with the practice of medicine. Therefore, I urge the NRC to adopt the ACNP/SNM Petition for Rulemaking as soon as possible.

Sincerely,

Ted J. Roper, M.D.

TJR/grp

8910250313 891017
PDR PRM
35-9 PDR

2510