



DEPARTMENT OF THE ARMY

BROCKE ARMY MEDICAL CENTER
FORT SAM HOUSTON, TEXAS 78234-8200

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November 3, 1989

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REPLY TO
ATTENTION OF

Department of Radiology - DOCKET NUMBER
Nuclear Medicine Service PETITION RULE PRM 35-9
(54FR 38239)

OFFICE OF THE SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, D.C. 20555

Dear Sir or Madam:

This letter is written in support of the petition requesting a rule change to 10CFR 30, 33, and 35 (Docket No. PRM-35-9) to permit physicians to prescribe radiopharmaceuticals and for pharmacists to compound and dispense radiopharmaceuticals in accordance with existing FDA and State regulation.

The Nuclear Regulatory Commission, since inception, has refused to recognize the practice of pharmacy, as well as certain aspects of the practice of medicine.

The view of the author is not necessarily that of the U.S. Army. However, other radiopharmacists within the military system have concurred that the compounding and manufacturing of pharmaceuticals should be in accordance with the FDA and State regulations, rather than the Nuclear Regulatory Commission, as present.

Sincerely,

Michael D. Berndt, RPh, BCNP
Major, U.S. Army
Chief, Nuclear Pharmacy

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