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Physicians -- Radiologists

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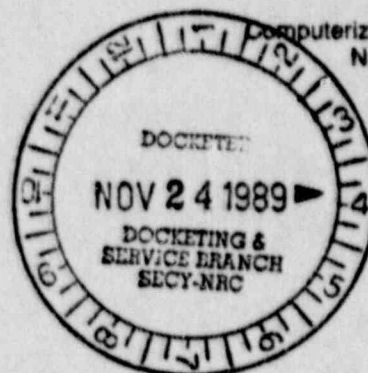
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Diagnostic Radiology
Ultrasound
Computerized Tomography
Nuclear Medicine

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PETITION RULE PRM 35-9
(54FR 38239)

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

Dear Mr. Secretary:

for nuclear medicine

I strongly support the petition for rule making which has been filed by the American College of Nuclear Physicians, and The Society of Nuclear Medicine. As a practicing diagnostic radiologist who uses nuclear medicine considerably in the diagnostic practice, I am very careful to whom I give the diagnostic nuclear medicine tracer isotopes. By not following the recommendations of those who are most knowledgable in this area (The American College and The Society mentioned above) we will end up with more stringent rules which will result in patients sometimes not getting diagnostic nuclear medicine studies that could be definitive, and getting instead other diagnostic studies, sometimes with more radiation, but yet with less chance of finding an answer.

We all agree that we do not want misadministrations of radio-isotope material, but any rules which are set down should be able to control any (as I understand it unsubstantiated assumptions of) misadministrations without hampering patient care. State Boards of medical quality assurance as we have in Oregon checks on the people using nuclear medicine, and their checking is very vigorous. The people who do this are very knowledgable. If such is not the case in other states, then rules should be set up to make them function as they do in the State of Oregon, and we should not be setting up unduly restrictive rules to hamper patient care.

Sincerely,

Richard Arkless, M.D.

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