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St. Luke's Medical Center
Aurora Health Care

November 28, 1989

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

Mr. Secretary:

I am a practicing Nuclear Pharmacist concerned about proposed changes resulting from 10 CFR 35 regulations governing medical use of by-product materials. I wish to voice my strong support for the petition filed by the College of Nuclear Physicians and the Society of Nuclear Medicine.

The problem with the NRC regulatory changes cannot be overstated. By restricting medical isotope uses to those only on package inserts the agency is obviously attemping to prevent the practice of "bad" medicine by some individuals. But this blanket solution instead will prohibit the vast majority of nuclear medicine practitioners from performing "good" or "better" medicine through innovative techniques and uses of radio-pharmaceuticals.

Furthermore, the NRC is directly overstepping its authority by attempting to regulate the use of radiopharmaceuticals. The FDA clearly has jurisdiction in their use, and has clearly defined what is allowable within the practice of pharmacy and medicine.

In my ten years of practice there has never been such a clear threat to the profession of Nuclear Pharmacy. I strongly urge the NRC to adopt the ACNP/SNM petition for rulemaking as soon as possible.

Sincerely,

Timothy R. Strane M.S., RPh.
Nuclear Pharmacist

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2900 West Oklahoma Avenue, Milwaukee, Wisconsin 53215 (414) 649-6000