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Florida Pharmacy Association

November 27, 1989

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

Dear Secretary Chilk:

The Florida Pharmacy Association wishes to express our support for the Petition for Rule making filed by the American College of Nuclear Physicians (ACNP) and the Society of Nuclear Medicine (SNM) in regard to the 10 CFR 35 regulations.

Mr. Secretary, I am going to even attempt to discuss the issues that those people have so appropriately presented. What I want to do is assure you that the Florida pharmacist that are licensed as nuclear pharmacists are properly trained to fulfill the practices that the petition refers to: In 1983, we recognized the need to require nuclear pharmacists to complete additional training and schooling in order to practice as nuclear pharmacists. The Florida Board of Pharmacy presented them with a certificate that recognized the achievement of the additional training along with then general pharmacist license. This past year at the insistence of our Nuclear Pharmacist Section of the Association, we changed the laws to require licensure of nuclear pharmacists and added a requirement for continuing education in their field of practice. We are in the process of adopting rules regarding the educational offerings. Prior to this new law, the nuclear pharmacists attended our consultant pharmacist educational programs that also provided workshops for nuclear pharmacists.

Mr. Secretary, I am trying to impress upon and assure you that nuclear pharmacists are well trained and prepared to assume these tasks that the proposed petition would allow.

The Florida Board of Pharmacy and the Florida Pharmacy Association are very proud of the steps we have taken to make certain our nuclear pharmacists are well trained and that the public is adequately protected. Our state laws do permit a

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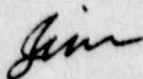


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pharmacist to dispense prescriptions written for new indications of approved drugs. The pharmacists do have to question the physicians in such instances or when they feel the patients health may not be best served by the prescription as written.

We, the Florida Pharmacy Association and its Nuclear Pharmacist Section urge you to support the adoption of the ACNP/SNM Petition for Rule making and allow such adoption to take place as soon as possible. Thank you for any consideration you can give this matter.

Respectfully yours,



James B. Powers
Executive Vice President

JBP/rf

