

*Nuclear Cardiac Scanning, P.C.*

299

STONY BROOK MEDICAL PARK  
2500-1 ROUTE 347  
STONY BROOK, NEW YORK 11790

DOCKET  
CONTROL

'89 DEC -1 P1:47

DOCKET NUMBER

PETITION RULE PRM 35-9

(54 FR 38239)

751-1648  
751-1649

OFFICE OF  
DOCKETING & SERVICE  
BRANCH

November 28, 1989

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

Dear Mr. Secretary:

This letter is written 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 Technologist at Nuclear Cardiac Scanning P.C. in Stony Brook, New York. I feel that the revised 10CFR 35 regulations (effective April 1987) significantly impact the practice of Nuclear Medicine by restricting the physician from ordering tests which have been proved diagnostic yet do not appear in package inserts, and by restricting radiopharmacies. Our practice uses a commercial radiopharmacy for its supply of radiopharmaceuticals.

The NRC's primary regulatory focus appears to be based on the assumption that misadministrations of diagnostic radiopharmaceuticals poses a serious threat to public health and safety. Firstly, I assert that the incidence of misadministrations is extremely small. Secondly, Nuclear Medicine Procedures are extremely low health risk diagnostic tests.

I believe that 10CFR part 35 should be revised to recognize all the mechanisms that the FDA uses to authorize the use of radiopharmaceuticals. I strongly urge the NRC to adopt the Petition for Rulemaking filed by the American College of Nuclear Physicians and the Society of Nuclear Medicine.

Sincerely,

Anita Vultaggio, CNMT

8912070129 891128  
PDR PRM  
35-9 PDR

25/10