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INTERNAL MEDICINE
ENDOCRINOLOGY & METABOLISM

DIPLOMATE
American Board Of Internal Medicine

FELLOW
American College Of Physicians

November 21, 1989

NUCLEAR MEDICINE

MEDICAL DIRECTOR
Nevada Nuclear Medicine Laboratory

DIPLOMATE
American Board Of Nuclear Medicine

MEMBER
American College of Nuclear Physicians

DOCKET NUMBER

PETITION RULE PRM 35-9

(54 FR 38239)

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OFFICE OF THE
DOCKETING
BRANCH

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

Dear Mr. Secretary,

I am writing to you to request that the American College of Nuclear Physicians/Society of Nuclear Medicine petition for Rulemaking be implemented.


I have been practicing nuclear medicine for 25 years. I ran the nuclear medicine department at Southern Nevada Memorial Hospital (now University Medical Center) here in Las Vegas for two years and opened the first independent nuclear medicine laboratory licensed by the State of Nevada in 1973 which I continue to own, run, and operate.

The rules which have been implemented by the Nuclear Regulatory Commission and subsequently adopted by the State of Nevada during the period of time that my fees for my clinical services have increased 150% from 1973 thru 1989, have increased the cost of radiol isotopes in excess of 1000% with no additional benefits to the patients and with no additional profits to the suppliers. Your increasing rules, requirements, regulations which are proposed, further threaten to both limit the access of patients to quality nuclear medicine services and continue to increase the costs.

For this reason, I am requesting that the petition by the Society of Nuclear Medicine be implemented to prevent further increased costs and deterioration of care to patients.

Your consideration of this would be greatly appreciated.

Sincerely yours,



Robert W. Clark, M.D.

RWC/Jmr 8912150025 891121
PDR PRM
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cc: Senator Richard Bryan
Senator Harry Reid

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