MIDWAY PARK MEDICAL CENTER

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December 6, 1989

Secretary of the Commission U.S. NUCLEAR REGULATORY COMMISSION Docketing and Services Branch, Docket No. FRM-35-9 Washington, D.C. 20555

RE: Docket No. FRM-35-9

Dear Mr. Secretary:

I am writing to add my support for the Petition for Rulemaking, Docket No. FRM-35-9. This patition, jointly filed by the American College of Nuclear Physicians and the Society of Nuclear Medicine, will remove many barriers unnecessarily restricting the practice of nuclear medicine.

Moreover, adoption of this petition will allow for a more cost efficient provision of nuclear medicine procedures by: significantly reducing the number of repetitive and/or serial nuclear medicine procedures; and allow more optimal procedures/methodologies to be employed. Superrestrictive language governing the use or administration of approved radiopharmaceuticals and 'kits' is but one example of current and inappropriate regulation.

The more cost efficient utilization of nuclear medicine through greater efficiency and fewer repetitive studies should not be dismissed lightly. Especially since adoption of this petition would provide for more optimal procedures, better patient care, fewer expensive nuclear medicine studies now allowed - although sub-optimal, and yet poses no creditable threat to public health.

Both the ACNP and the SNM are well respected scientific and medical organizations. The Society of Nuclear Medicine in particular, has earned international respect and is considered the world's prime forum in nuclear medicine research and application.

The NRC, our patients, hospitals and the American public would be well served through the adoption of this petition as requested.

Sincerely_ et Jack Houghton Administrator

oc: U.S. Senator Lloyd Bentson U.S. Senator Phil Gramm 8912180074 891206 PDR PRM 35-9 PDR 2600 West Plecsant Kun Koad Lancaster, Texas 75146-0720

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