(328)

BETH ISRAEL MEDICAL CENTER FIRST AVENUE AT 16TH STREET, NEW YORK, NY 10003 (212) 420-2000

December 6, 1989

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

DOCKET NUMBER PETITION RULE PRM 35-9 (54FR 38239)

'89 DEC 11 P2:08

OFFICE OF SECRETARY DOCKETING & SERVICE BRANCH

Dear Mr. Secretary:

I am writing to express my strong support for the Petition for Rulemaking filed by the American College of Nuclear Physicians and the Society of Nuclear Medicine. As a practicing radiologist at Beth Israel Medical Center in New York City, I am deeply concerned over the revised 10 CFR 35 regulations (effective April, 1987) governing the medical use of byproduct material as they significantly impact my ability to practice high-quality Nuclear Medicine.

Highly restrictive NRC regulations will only jeopardize public health and safety by: restricting access to appropriate Nuclear Medicine procedures; exposing patients to higher radiation absorbed doses from alternative legal, but non-optimal, studies; and exposing hospital personnel to higher radiation absorbed doses because of unwarranted, repetitive procedures. The NRC should not strive to construct proscriptive regulations to cover all aspects of medicine, nor should it attempt to regulate radiopharmaceutical use. Instead, the NRC should rely on the expertise of the FDA, State Boards of Pharmacy, State Boards of Medical Quality Assurance, the Joint Commission on Accreditation of Healthcard Organizations, radiation safety committees, institutional Q/A review procedures, and most importantly, the professional judgement of physicians and pharmacists who have been well trained to administer and prepare these materials.

In closing, I strongly urge the NRC to adopt the ACNP/SNM Petition for Rulemaking as expeditiously as possible.

Sincerely,

C. Richard Goldfarb, M.D.
Chief, Nuclear Medicine

CRG/re

DS10