PETITION RULE PRM 35-9

Kennedy Memorial Hospitals

## University Medical Center

CHERRY HILL . STRATFORD . WASHINGTON TOWNSHIP

PROFESSIONAL RADIOLOGY ASSOCIATES, P.A.

STRATFORD DIVISION

18 E. Laurel Road Stratford, NJ 08084 609-435-2415

DEPARTMENT OF RADIOLOGY & MED. IMAGING

MILTON METZMAN, D.O.
PAUL J. CHASE, D.O.
MARVIN A. KUPERSMIT, D.O.
STEVEN ALLEN, D.O.
KALPANA DESHMUKH, M.D.

December 5, 1989

DEC - 8 1989 - 111

DEC - 8 1989 - 111

DOCUMENTING & SERVICE BRANCON
SUCY SINCE

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 express my strong support for the Petition for Rulemaking filed by the American College of Nuclear Physicians and the Society of Nuclear Medicine. I am a practicing Radiologist at Kennedy Memorial Hospitals-UMC in Stratford, New Jersey. I am deeply concerned over the revised 10 CFR 35 regulations governing the medical use of byproduct material as they significantly impact my ability to practice high-quality Nuclear Medicine and are preventing me from providing optimized care to individual patients.

The highly restrictive NTC 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.

I strongly urge the NRC to adopt the ACNP/SNM Petition for Rulemaking as expediously as possible.

Sincerely,

Milton Metzman, D.O. Chief of Radiology

mich hipacel

MM:ps

8912180145 891205 PDR PRM PDR

The Major Teaching Affiliate of the University of Medicine and Dentistry of New Jersey
New Jersey School of Osteopathic Medicine

DS10