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Secretary of the Commission U.S. Nuclear Regulatory Commission Washington, DC 20555

DOCKETIN 149 8419

Walter B. Miller, Pharm.D. 4024 F Kingsgate Place Charlotte, NC 28211

ATTENT/ON: Docketing and Service Branch

RE: Docket No. PRM-35-9

Ladies and Gentlemen:

As a practicing nucle: pharmacist, I support The Society of Nuclear Medicine and the American College of Nuclear Physicians Petition for Rulemaking.

Nuclear Medicine is a rapidly growing area with new uses for old radiopharmaceuticals being discovered every day. It simply is not possible for all uses of a given preparation to be listed in a package insert.

Of particular interest to me is the NRC's reinterperation of license conditions for nuclear pharmacies and regulations for nuclear medicine licensees. At issue is a requirement to strictly follow the manufacturer's instructions for preparation of radiopharmaceuticals as printed in the manufacturer's package insert. The package insert information should be considered as a guideline in the preparation and use of any products, but pharmacists must have the ability to use professional judgement in compounding to assure the prescribing physician receives the most efficacious product for his/her patient.

Sincerely

Walter B. Miller, Pharm.D.

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