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Docketing and Service Branch, Docket # PRM-35-9
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OFFICE OF SECRETARY
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BRANCH

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 Nuclear Medicine Technologist at Baptist East Hospital in Louisville, Kentucky and I am deeply concerned over the revised 10 CFR 35 regulations (effective April, 1987) governing the medical use of byprooduct material.

For example; the use of albumen colloid and pyrophosphate in G.I. bleeding studies, also M A A in the diagnosis of venus thrombosis. Both of these studies are routinely used in our department. These studies yield high diagnostic results and in many cases save the patient from traumatic examination.

The NRC should recognize that the FDA does allow, and often encourages, other clinical uses of approved drugs, and actively discourages the submission of physician sponsored IND's that describe new indications for approved drugs. In many cases, manufacturers will never go back to the FDA to revise a package insert to include to include a new indication because it is not required by the FDA and there is simply no economic incentive to do so.

Finally, I would like to point out that highly restrictive NRC regulations will only jeopardize public health and safety by restricting access to Nuclear Medicine procedures.

Sincerely yours

Dewey F. Crawford B.S. R.T.(N)

P.S. The technetium options have been an asset to patient Diagnosis we need this flexibility in orda to better help our patients recover.

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