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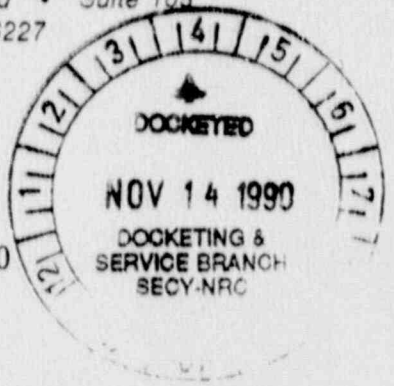
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nabp

National Association of Boards of Pharmacy

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November 8, 1990

Frederick J. Shon  
Deputy Chief Administrative Judge  
Atomic Safety & Licensing Board Panel  
USNRC  
Washington, DC 20555

Dear Mr. Shon:

I am contacting you as the Executive Director of the National Association of Board of Pharmacy (NABP), the association that represents the state boards of pharmacy in the United States, the District of Columbia, Puerto Rico, the Virgin Islands, eight Canadian provinces and the State of Victoria, Australia.

NABP affirms its support of the Nuclear Regulatory Commission's (NRC) decision to withdraw its previous regulation and recognize that pharmacists, in the course of pharmacy practice, i.e. preparing and dispensing radiopharmaceuticals, are legally able to depart from the package insert pursuant to a valid prescription. The decision of the NRC in this regard recognizes the professional judgement of the pharmacist in preparing pharmaceuticals, does not impinge on states' authority to regulate the practice of pharmacy, and does not conflict with Food and Drug Administration (FDA) policies for the compounding and dispensing of radiopharmaceuticals.

It has been the position of NABP and its members that cooperative federal and state regulation is the key to successfully protecting the public health. The NRC plays a critical role in regulating radiopharmaceuticals. However, it should not be the agency solely responsible for this regulation and engage in activities that conflict with the states' authority to regulate pharmacy practice.

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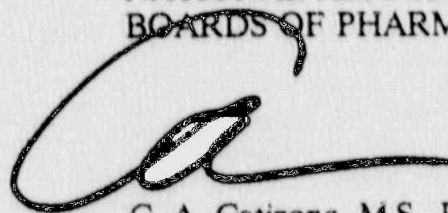
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We strongly disagree with a minority of individuals that continue to assert state boards of pharmacy are not regulating the preparation and dispensing of radiopharmaceuticals. Such contentions are false and dangerous. The state boards of pharmacy are regulating the practice of nuclear pharmacy and recognize the uniqueness of this practice.

I am hopeful that you will continue to support the cooperative federal and state regulation of radiopharmaceuticals as it currently exists and discourage any movement by the NRC to assume total responsibility for this area of patient care and the practice of pharmacy. Thank you for your consideration.

Respectfully Yours,

NATIONAL ASSOCIATION OF  
BOARDS OF PHARMACY



C. A. Catizone, M.S., R.Ph  
Executive Director

CC/ps