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PROPOSED RULE PR 20
(59 FR 9146)

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service Branch

Dear Sir/Madam,

Thank you for the opportunity to comment on this important issue. As a representative of the Immunoassay Laboratory at the Spaulding Rehabilitation Hospital, I strongly recommend the continuation of the exemption in its current form. Our judicious use of low level radioactive isotopes, in the form of test kits for *in vitro*-testing, is very carefully monitored. However, realizing the vast number of users of radioactive material and consequential results, I hope the development of new technologies for *in vivo* treatment, currently under development, will be implemented in the not too distant future. It seems the most complete way to finalize radiation safety. The process that eliminates radioactive by-products more completely would seem preferable.

Thank you again for this opportunity to comment. We look forward to commenting on any proposed regulations that are forthcoming.

Sincerely,

Anna Newberg, M.T. (ASCP)
Immunoassay Laboratory

cc: Frank Masse, Consultant
Radiation Safety Committee

Teresita S. Valdez, Director
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