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PROPOSED RULE PR-35
(48FR 13189) ①

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

Attn: Docketing and Service Branch

RE: Federal Register Vol 48, No. 62
March 30, 1983, 13189 - 13191.

Gentlemen:

I agree with your proposed rule to amend 10CFR35.100 Schedule A, Group VI to add a device used for instantaneous imaging with an Iodine-125 sealed source (Lixiscope). In your proposed rule you compared the Lixiscope with the Sr-90 ophthalmic applicator. I have been advised that you propose to require the same 24 hours of training associated with the Sr-90 device for the Lixiscope. It is my opinion that the Radiation Safety Training Course provided by the manufacturer would be adequate to allow the physician to become well acquainted with Government Regulations on the care, handling and use of the Lixiscope with nuclear materials. I would also recommend that the physician receive on-hand training in the use of the Lixiscope.

In your schedule of training for physicians wishing to use Sr-90 for ophthalmic eye applicators is a totally different application than what is being applied at this time. It is my opinion that the basic training in radioisotope handling and techniques and radiation safety is necessary for the use of the Sr-90. However, for the uses outlined for the Iodine-125 it is on an indirect basis and, in my opinion, a two hour training period, certainly would suffice to train a physician quite easily in the use of this instrument.

Thank you for the opportunity to review this proposal.

Very truly yours,
DOWNERS GROVE ORTHOPEDIC ASSOCIATES

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Acknowledged by card 4/29/83 PD

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