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Secretary,  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
attn.: Docketing and Service Branch

Dear Sir:

I appreciate the opportunity to comment on Draft Regulatory Guide DG 8015. This is a well considered document and will contribute to the improved handling of release of therapy patients.

There are two areas in the Guide that i feel need further attention:

1. Release of Patients Treated for Thyrotoxicosis, Dosage Range: 4 to 16 mCi.

In the Guide, Table 2, page 4, it is indicated that records must be kept for *any* patient who receives more than 6.5 mCi of I 131.

By my calculations (attached), the exposure from these patients will be 10 to 50 mrem. This is overkill and will generate unnecessary paperwork.

2. Release of Patients Treated for Thyroid Cancer, Dosage Range: 100 to 300 mCi.

In treatment, the first step is Thyroid ablation. Sometimes I 131 is the agent of choice. More often, this effect is achieved by Surgery.

In either case, subsequent therapies will result in exposures that are significantly different from the "Guide" calculations. Usually, these patients will present with a Thyroid Uptake of less than 5 %.

The attached table shows that for 100 mCi and uptake of 5 %, the first day exposure is 130 mrem and the subsequent exposure is 50 mrem for a total of 180 mrem as compared to the Guide value of 499 mrem.

The above calculations assumed a minimum distance of one meter. If two meters are used on the first day and two meters is employed on subsequent days, the calculated (attached table) exposure is 30 + 50 or 80 mrem. With this regime,

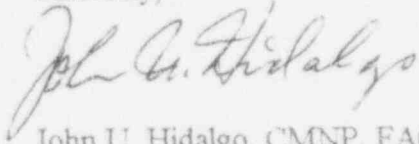
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200 mCi would expose to 160 mrem and 300 mCi would expose to 320 mrem.  
These are significantly lower yet conservative exposure levels and are realistic

As a Certified Medical Nuclear Physicist it will be my responsibility to make these estimates. I urge your serious consideration of these changes.

Sincerely,

A handwritten signature in cursive script that reads "John U. Hidalgo". The signature is written in dark ink and is positioned above the printed name.

John U. Hidalgo, CMNP, FACNM.