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VERMILLION COUNTY HOSPITAL

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DOCKET NUMBER
PETITION RULE PRM 20-20
(56 FR 26945)

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August 8, 1991

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

ATTEN: Docketing and Services Branch

RE: SUPPORT FOR DOCKET NO. PRM-20-20

Gentlemen:

I am writing in support of Carol S. Marcus' filing of Petition for Rulemaking which was assigned Docket No. PRM-20-20. Ten CFR 20.1301 has reduced the total effective dose equivalent (EDE) to individual members of the public from 0.5 rem (5 mSv) to 0.1 rem (1 mSv). In order to satisfy these criteria, patients from therapeutic, and some diagnostic, dosages would have to remain hospitalized at great expense. This is at a time when attempts are being made to decrease medical costs. These increased costs are not justified by the results of a likely insignificant decrease in exposure to a small percentage of the population.

I am also in agreement with Dr. Marcus' proposal to retain the 30 mCi limit for I-131 of 35.75(a)(2), but vary the maximum activity of other radionuclides consistent with NCRP 37 calculations.

Thank you for your attention to these matters.

Sincerely,

Terry Clutter
Nuclear Medicine

TC:df

cc: Curtis Gutwein, Director of Radiology
Christine Molby, Asst. Admin., Ancillary Services

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PDR PRM
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