



Chief, Rules Review and directive Branch
U.S. Nuclear Regulatory Commission
Washington, D.C.

10702
59FR55068

11/03/94

~~John Glenn~~
~~Pat Holahan~~

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1995 MAR -2 AM 11:01
RULES REVIEW & DIR. BR.
USNRC

This letter is in response to the request for comments regarding potential modifications of radiation therapy published in the Federal Register on November 3, 1995.

Answers to those questions listed in the Federal Register are found below.

1. Significant error level is 20 percent for HDR brachytherapy, other brachytherapy, and radiopharmaceutical therapy.
2. Yes, additional therapy can be given to make up any dose if desired.
3. Computer system is verified by comparison with established published data.
- 4.
- 5.
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- 10.
- 11.
12. Yes, ordered by authorized user, nurse writes order.
13. Some activity of sources are verified upon receipt by a physicist or dosimetrist using a well calibrator.
14. Radiographic films are used to ensure proper placement. Packing and sutures are used to minimize the likelihood of source movement.
15. The authorized users are satisfied with current procedures.
- 16.
17. All nurses handling brachytherapy patients receive adequate training.
18. For permanent prostate implants it is acceptable for 15-20% of implanted seeds to be outside the target volume.
- 19.
20. If multiple fractions are to be administered each individual fraction should require a new written directive.
21. A separate written directive for fractionated therapy is prepared.
22. If any guidance is needed several sources are available such as the company which markets radiopharmaceutical or current published materials like textbooks or review articles.
- 23.

Sincerely;

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