



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

13

'91 AUG -1 A9 148

July 25, 1991

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

ATTN: 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. 10CFR20.1301 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 30mCi 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,

Thomas W. McCreary III, M.D.
Medical Director, Nuclear Medicine

TWMcC/dc

1000 Dutch Ridge Road
Beaver, PA 15009
412-728-5000

910B050050 910725
PDR PRM
20-20 PDR

DS10