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RADIATION PHYSICS

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

ATTENTION: DOCKETING AND SERVICE BRANCH

Dear Sirs:

I wish to comment on the proposed regulation requiring reportage of mid-administration of ionizing radiation to patients. I perceive the intent of the regulation is to ensure a high level of quality assurance with respect to the administration of ionizing radiation. The intent is commendable. The proposed regulation is, however, ridiculous. The government is merely being officious in proposing a regulation which does not take into consideration the exigencies of the real world.

In reality, the diagnostic doses of radionuclides are low enough that 20% increase in dose is insignificant with respect to somatic effects upon the patient. It is, of course, desirable to keep radiation doses to the general population as low as achievable to prevent the statistical problem of increase in genetic mutation rate. It would be detrimental however, to try to explain that the patient has been given an "over-dose" which in affect is not an over-dose. Because of the possibility of inducing hysteria in a population already becoming chary of radiation and its affects, to contribute to this problem by a regulation which can have no beneficial effect correlates with irresponsible government.

Thank you for your attention to these comments.

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