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S. Neachant



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Aug. 25, 1998

# THE CLEVELAND CLINIC FOUNDATION

One Clinic Center 9500 Euclid Avenue Cleveland, Ohio 44195-5074

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December 4, 1998

Gopal B. Saha, Ph.D.  
Nuclear Medicine / Gb3  
216/444-2777

Secretary  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

Attention: Rulemaking and Adjudications Staff

RE: Draft NUREG-1556, Vol.9  
Section 8.31

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1998 DEC -9 PM 4:50  
FILES & DTL BRANCH  
US NRC

Dear Sir/Madam:

I am sorry that my response may be late by a few days from your deadline, but I came across the draft copy only yesterday.

I am suggesting an added modification to a requirement in Section 8.31 Item 10: Use Records.

You have stated a requirement as, "Prescribed dosage and activity at the time of determination, or a notation that the total activity is less than 1.1 mega-Bq (30  $\mu$ Ci)".

I suggest the following requirement, "Prescribed dosage and activity at the time of determination (unless already recorded in a clinical procedure manual, or on a dosage list of routine clinical procedures) or a notation that the total activity is less than 1.1 mega-Bq (30  $\mu$ Ci)".

I think this addition is important to every nuclear medicine department and should be incorporated. Thank you.

Sincerely,

*Gopal Saha*

Gopal B. Saha, Ph.D.  
Director of Nuclear Chemistry  
and Pharmacy

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GBS/rmb

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