

Baptist Medical Center



HEALTH MIDWEST

DOCKETED  
USNRC

Center For  
Radiation  
Therapy

Endocurie Therapy  
Hyperthermia  
Radiation Oncology

98 JAN 12 P3:15

December 2, 1997

Dr. Donald A. Cool  
U.S. Nuclear Regulatory Commission  
11545 Rockville Pike  
Rockville, Maryland 20852-2738

OFFICE OF SECRETARY  
RULEMAKING AND  
ADJUDICATIONS STAFF

DOCKET NUMBER  
PROPOSED RULE PR 35  
(62FR42219)

Dear Dr. Cool:

I am a practicing Radiation Oncologist, Board-Certified by the American College of Radiology, and am writing to you to request your support concerning upcoming NRC revisions related to several critical aspects of Therapeutic Radiology, Nuclear Medicine, and Diagnostic Radiology. Specifically, I am concerned about the possible revision of 10CFR, Part 35, as it relates to the regulation of authorized users of brachytherapy, sources, and the required training requirements thereof. In addition to four years of residency training, three of which were spent learning the various complexities of radiation biology, physics, and treatment-planning, it was appropriately required that I be certified through, both, written and oral examinations, administered through the American Board of Radiology. Additionally, I received more than 200 hours of didactic training in radiation biology and physics, in addition to innumerable hours of being supervised in the handling of, both, intracavitary and interstitial radioactive sources. I feel that it is imperative that the NRC continues to require such intensive training requirements, as any loosening of these standards, I feel, would result in an increased risk of harm to, both, the patients who are treated with radiation, as well as the healthcare professionals involved in this treatment. I strongly support the NRC's current policies, as I feel that they ensure the highest degree of accuracy and safety in treating patients with radiation. In order for authorized users to continue to be adequately trained, I, likewise, support a minimum of three years of ACGME-approved training in Therapeutic Radiology. As in all fields of medicine, what is best for our patients should always be the focus of our interests. I know that you will consider this matter seriously in your review of any NRC revisions that, I understand, are now being considered.

I very much appreciate your attention to this matter. I would be happy to discuss this or any related issue and/or detail, if you would like. I can be reached at (816) 363-2100.

Sincerely,

Stephen S. Nigh, M.D.

SSN/rrh

