PROPOSED RULE PR 35

(62FR42219)

SECTION OF BRACHYTHERAPY ARTHUR G. JAMES CANCER HOSPITAL AND RESPARCH INSTITUTE OHIO STATE UNIVERSITY 300 WEST TENTH AVENUE COLUMBUS, OHIO 43210

614-293-8415

FAX TO:

Dr. Donald A. Cool, U.S. Nuclear Regulatory Commission

FAX NO:

301-415-5369

DATE:

12/3/97

FROM:

Subir Nag, M.D.

FAX NO:

614-293-4044 NO. OF PAGES (INCLUDING THIS ONE): 1

PLEASE CALL 614-293-3246 TO CONFIRM RECEIPT OR IF YOU DO NOT RECEIVE ALL OF THE PAGES, OR IF ANY PART IS ILLEGIBLE.

Re: Training requirements for use of brachytherapy sources

Dear Dr. Cool:

I would like to express my concern and opinion regarding the training requirements. When 10 CFR Part 35 is revised, there should be no change in the training requirements for teletherapy or brachytherapy for the safety of the patients. Physicians treating patients with radiation should be adequately trained in radiation therapy, and should be cognizant of the long-term adverse effects of radiation therapy. The physician should, therefore, also have adequate training to handle emergencies that may be caused by radioactive material. The physician should have at least three years of training in therapeutic radiology, even if they are providing brachytherapy at one site, e.g., the heart or the brain.

I hope you will consider the above when revising 10 CFR Part 35 regulations.

Thanking you,

Sincerely,

230278

Subir Nag, M.D.

Chief of Brachytherapy

Professor of Clinical Radiology

President-Elect, American Brachytherapy Society

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