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USNRC

December 10, 1997

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RULEMAKING AND
ADJUDICATIONS STAFFDr. Donald A. Cool
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20852-2738DOCKET NUMBER
PROPOSED RULE **PR** 35
(62FR42219)

Dear Sir,

I am writing to you to voice my concern over any proposed revisions to "10 CFR Part 35"

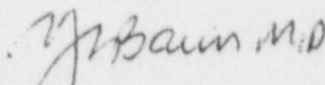
These time-tested guidelines regarding the use of teletherapy equipment and brachytherapy sources have been essential in maintaining the high standards of safety and efficacy that the United States enjoys today. Any ill-advised changes to relax any training requirements could have a tremendous detrimental effect on how patients are treated.

As you know, radiation cannot be undone once delivered. Given this, there is no margin for error. For this reason, ABR certification in therapeutic radiology requires at least 6000 hours of direct clinical experience using radiation to treat patients. Safety in this field mandates knowing more than what dose to prescribe. It is essential that the treating physicians understand the underlying radiobiological aspects both to know why these treatments are effective and also to monitor these patients for long term sequela.

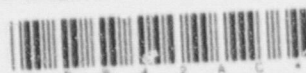
The training requirement for coronary artery brachytherapy should be that for all brachytherapy. This is true regardless of whether a beta or a gamma source is used. Radiation to the heart is a high risk procedure for the patient. Authorized users of equipment to do this treatment should have at least 3 years in therapeutic radiology. This same principle applies to the use of the Gamma Knife when performing stereotactic radiosurgery.

The regulations that have been in place have served our communities well. There is no reason to revise them. As the old adage goes.... "If it ain't broke, don't fix it!" Thank you for your time.

Sincerely yours,


Yadvendra S. Bains M.D.

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