

135

PIEDMONT RADIATION ONCOLOGY ASSOCIATES, P. A.

P.O. Box 8975 • Station A • Greenville, SC 29604 • Phone 455-8756

Lewis N. Terry, Jr., M. D. • Dale L. Duncan, M. D. • Jeannette L. Wilcox, M. D. • Ronald L. Terry, M. D.

DOCKET NUMBER
PROPOSED RULE PR 35
(62FR42219)

December 4, 1997

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

FAX: (301)-415-5369

Dear Dr. Cool:

I understand that training requirements for the use of brachytherapy are being reevaluated. I can understand why that would be considered, considering the current studies looking at radiation to decrease the likelihood of re-stenosis of coronary arteries; however, I have a serious objection to changing the training criteria for the use of brachytherapy.

I do not understand why finding different uses for brachytherapy would in any way change the dangers involved in using radiation sources. Just because we found new uses of brachytherapy in cardiac disease, it does not in any way minimize or diminish the significant training required to ensure the safety of our patients when using radioactive sources. I can understand that finding new ways of using brachytherapy sources would put pressure on your committee to change those requirements, but I do not in any way see the rationale behind changing them. It might make sense to change the training requirements for the use of brachytherapy if our research breakthroughs were in the area of patient safety. But the research has not been in the areas of patient safety, the research has been in the area of patient treatment and the pressure has come from those who want to use brachytherapy rather than those who already are trained to use it.

Regardless of whether a beta or a gamma source is used, safety of the patient has to be the foremost concern. It is not clear to me how a physician who is not board certified to be an authorized user of brachytherapy sources, or who has not undergone the equivalent training for same, could possibly be able to provide the level of safety necessary as those who do meet those requirements. Standards should not be lessened simply because there is pressure to do so. I hope you will continue to require the stringent training that is required at this point for the use of brachytherapy sources.

With best regards,

Jeannette L. Wilcox
Jeannette L. Wilcox, M.D.
JLW/lea/mds

9801260036 971204
PDR PR
35 62FR42219 PDR



DOCKETED
USNRC

98 JAN 12 P3:58

OFFICE OF SECRETARY
RULEMAKING AND
ADJUDICATIONS STAFF

DS10