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A Sutter Health Affiliate

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Radiation Oncology  
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December 8, 1997

OFFICE OF SECRETARY  
RULEMAKING AND  
ADJUDICATIONS STAFF

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

DOCKET NUMBER  
PROPOSED RULE PR 35  
(62FR42219)

re: 10CFR Part 35

Dear Dr. Cool:

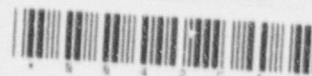
This letter is to emphasize the importance of current training requirements for brachytherapy and teletherapy. Radioactive sources should definitely not be handled by physicians who do not have extensive training. In fact, the current training requirements have accomplished their mission. Patients have been protected. Using radiation safety requirements goes against the public's increasing concern about that very issue. The physician's involvement in radiation safety goes far beyond just prescribing a dose. Understanding how the sources are to be used, what a prescribed dose actually means, and the radiation safety issues both from a personnel standpoint and, more importantly, from the patient's standpoint, are crucially important.

It is inconceivable that training requirements for coronary artery brachytherapy should be any less than for brachytherapy used in the treatment of malignancies. In fact, in some situations the patients may have a much longer lifespan and therefore the risks from radiation injury are much greater. This applies whether a beta or a gamma source is used. Radiation to the heart must be considered a high-risk procedure. It would be ill-advised to lessen the training for uses of this equipment and technology to have less than the currently required 3 years of therapeutic radiology/radiation oncology.

In a similar vein, the training requirements for gamma knife radiosurgery have to be the same as that for all teletherapy. The treatment of brain parenchyma is similarly a very high risk procedure for the patient. Again, authorized users should have a minimum of 3 years in therapeutic radiology.

The board certification rendered by the American Board of Radiology certainly covers the necessary training. If other specialty boards are to be considered for credentialing users of these forms of radiation therapy, the standards have to be the same with respect to radiation therapy training. The ABR requires 6000 hours of direct clinical experience with radiation in order to establish competency. This requirement should not be lessened.

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A Nonprofit Community Medical Center

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Thank you so much for your consideration.

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'F. Halberg', written over the closing 'sincerely,'.

Francine Halberg, M.D.

dc/12-9