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FOUR-COUNTY  RADIATION MEDICINE

OFFICE OF SECRETARY
RULEMAKING AND
ADJUDICATIONS STAFF

December 1, 1997

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

DOCKET NUMBER
PROPOSED RULE PR 35
(62FR42219)

Dear Dr. Cool:

It comes to my attention that the NRC may change its policy concerning the training requirements for the use of radiation therapy including teletherapy equipment and brachy therapy sources.

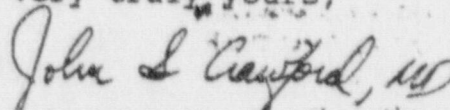
For the safety of patients and to ensure careful radiation therapy, I believe the training requirements should not be changed and should remain board certification by the American Board of Radiology and Radiation Oncology.

We have worked very hard in radiation oncology to introduce quality assurance measures such as the need for patient positioning, stabilization and precision in our treatments.

Years ago, when radiologists were delivering radiation, it would be very common for the poorly trained physicians to "slap on a field". I believe that taking away the need for training and the concern for patients would be very counterproductive for the patients.


In short, standards should not be lessened for the use of radiation or brachy therapy, including the Gamma knife or other marketing ploys.

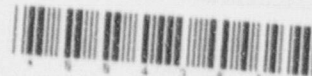
Very truly yours,


John S. Crawford, M.D.

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