



The Department of Radiation Oncology  
Radiation Therapy / Radiation Physics / Radiation Biology

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USNRC

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December 16, 1997

OFFICE OF SECRETARY  
RULEMAKING AND  
ADJUDICATIONS STAFF

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

DOCKET NUMBER  
PROPOSED RULE PR 35  
(62FR42219)

Dear Dr. Cool,

The U.S. has a stellar record for patient related radiation accidents. I believe that this is the case because of our current rigorous requirements for physician use of therapeutic radiation. As you know, the delivery of therapeutic radiation is not simply writing down a dose prescription. The delivery of therapeutic radiation is not carried out with "cookbook" methodology. The user must have indepth knowledge and insight about the principles of radiation biology and physics. Our residents are now required to train in therapeutic radiology for 4 years. Any individual delivering therapeutic radiation of any type, should be required to train for no less a period of time. As the NRC reviser 10CRF Part 35, please remember the patients. The safety implications for the delivery of therapeutic radiations are tremendous. Our patients are depending on us to ensure that they are treated properly. I hope you will do what is right for them.

Sincerely,

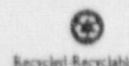
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