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

DOCKET NUMBER
PROPOSED RULE PH 35
(62FR42219)

Dear Dr. Cool:

I am writing to you in regards to the mandated review and revision of 10 CFR, Part 35, the regulations by which the NRC controls the medical use of radiation equipment and sources. In part, I would encourage you not to alter the current requirements necessary for designation as an authorized uses of radiation therapy, teletherapy or brachytherapy.

The NRC has done an excellent job of monitoring and controlling access to these modalities. This has served patients well assuring that the treating physician is well versed in the safe handling and usage of radioactive material. Altering the credentialing requirements for coronary artery, brachytherapy and Gamma-Knife teletherapy has the potential to cause great harm to patients who rely on the experts of their physicians safe usage of these materials.

As you know, radiation safety requires more than delivering a prescribed dose. It requires the user be adequately trained. A minimum of three years training with direct clinical experience should be maintained. I believe that maintaining high standards will continue to assure the public that radiation therapy is being used in the safest manner possible.

Sincerely,

Cary J. Schreiber
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Radiation Oncology
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