



Radiation Therapy

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

DOCKET NUMBER  
PROPOSED RULE PR 35  
(62FR42219)

Dear Dr. Cool:

It has come to my attention that the NRC will be revising 10 CFR part 35 and I would like to encourage the commission to retain the training requirements for teletherapy and brachytherapy. Patients are well served and protected by the current training requirements.

I understand that various cardiologists are looking to become authorized users of coronary artery brachytherapy and similarly there are neurosurgeons who would like to use the gamma knife to deliver radiation therapy without incorporating a therapeutic radiologist. Both of these procedures are high risk and I am in agreement that authorized users of this equipment should have at least three years of training in therapeutic radiology as is currently the standard. Should the NRC consider specialty boards beyond the American Board of Radiology for credentialing authorized users, I believe that the standards should not be lessened and specifically, users should have at least 6000 hours of direct clinical experience in using radiation to treat patients as is required by the American Board of Radiology when it certifies therapeutic radiologists to use these modalities.

Thank you for your consideration of this matter.

Most sincerely,

*Constance R. Bowie M.D.*

Constance R. Bowie, M.D.

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