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May 15, 1998

Judith Anne Stitt, M.D.  
Chair, Advisory Committee on the  
Medical Uses of Isotopes  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Stitt:

I recently attended the American Association of Clinical Endocrinologists (AACE) annual meeting, and it was brought to my attention that you are currently considering changing regulations that would greatly affect endocrinologists--in particular, Part 35CRF. This regulation involves iodine-131 by licensed clinical endocrinologists in the treatment of their patients. Clinical endocrinologists have been using this regulation for over 50 years, and there has been no reported misdosing or accidental dosing by an endocrinologist in the history of this treatment.

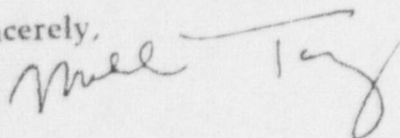
We feel that if you change the Regulation 35.932 (Training for Treatment of Hyperthyroidism), the additional 40 hours and the passing of a radiological examination would prohibit future use of radioactive iodine by endocrinologists. This would then cause difficulties for the patients. It would increase costs, and the patients would require a second specialist and a second consultation. They would perhaps have to drive quite some distance to obtain the treatment that they needed. They would probably have to go to a hospital setting, and this would all translate to a delay of treatment and increased costs.

I see no reason why the current regulation should be modified. Please consider the burden to the patient and the increased costs that would be the outcome of the proposed measure to increase the time required to obtain a license to dispense the iodine-131 and the increased burden for all involved to have a test administered by the radiologist to the endocrinologist.

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AACE's current program is extensive and covers all the pertinent information required for the dispensing of the radioactive isotope. Please reconsider all of the above when making your final ruling on the changing of Regulation 35.932.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Truong".

Michael P.M. Truong, M.D., F.A.C.E.

dmf