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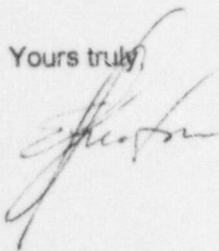
Judith Anne Stitt, MD
Chairwoman
Advisory Committee on the Medical Uses of Isotopes
Office of Nuclear Material Safety and Safeguards
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Stitt:

The intended revision of the requirements for training and experience required for use of radioisotopes in medical diagnosis and treatment is a significant issue for endocrinologists. Endocrinology is the medical specialty that developed these many of the isotopic methods, especially for thyroid disease, over fifty years ago. Since that time, endocrinologists have successfully and responsibly utilized these techniques, developing and using isotopic tools for patient care, such as radioimmunoassay and isotopic ligand receptor scanning. Endocrinology training programs have made considerable efforts to have appropriate training in isotope use available to trainees in the field. The proposed requirements would add unnecessary, additional expense and time to endocrine training programs, just for endocrinology subspecialists to obtain the additional training needed to allow them to care for their patients and continue developments in the field.

The current standards of training have allowed endocrinologists to be trained and licensed to provide appropriate medical care to the patients for whom they bear ultimate professional and legal responsibility. The proposed requirements, if implemented, add nothing to the safety or effectiveness of isotope use, and can not avoid causing greater cost and inconvenience for all involved, most especially the patients, who generally have no real choice when a diagnostic or treatment procedure is indicated. The proposed regulation changes are simply, and obviously, designed to prevent the subspecialty trained endocrinologist from continuing to provide services to their own patients when isotope use is indicated. This revision of training requirements for isotopic facilitated diagnosis and treatment of patients with thyroid disease is, therefore, entirely inappropriate.

Yours truly,



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