



# American Association of Clinical Endocrinologists

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October 12, 1999

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DOCKET NUMBER  
PROPOSED RULE **PR 20,32035**  
**(63FR43516)**

Dear Chairwoman Dicus:

The American Association of Clinical Endocrinologists represents over 3,200 endocrinologists in the United States who diagnose, treat, and follow patients who have hyperthyroidism. We are extremely concerned that the Organization of Agreement States is proposing that the NRC increase the number of hours training necessary to administer a single isotope (radioiodine-131) from 80 hours to 700 hours! Such action will eliminate endocrinologists from treating their own patients.

Historically, endocrinologists have been no less cautious in handling radioactive iodine than a radiologist or nuclear medicine physician. No one has demonstrated a radiation safety problem with the current system which has allowed endocrinologists to treat their own patients with hyperthyroidism for the last 50 years. If the agreement state proposal is adopted it will cause a drastic change in the pattern of treating hyperthyroid patients by necessitating consultation and treatment by still another specialist, in effect, creating a medical monopoly, delaying treatment, increasing cost, and leading to possible errors in communication or in the administration of radioiodine.

We respectfully ask that the NRC adopt the staff proposal concerning the licensing of radioiodine.

Respectfully,

Richard A. Dickey, MD, FACP, FACE  
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H. Jack Baskin, MD, FACE  
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