

596

DOCKET # 116
15 116

'99 OCT 21 P4:12

October 15, 1999

C
AD

Honorable CRETA J. Dicus, Chairwoman
Nuclear Regulatory Commission
016C1 Washington, D.C. 20555

DOCKET NUMBER
PROPOSED RULE **PR 20,32+35**
(63FR43516)

Dear Madam Chairwoman:

As a clinical endocrinologist involved in the treatment of patients with thyroid diseases, I am writing to express the strong hope that you and the other Commissioners will agree with the NRC staff recommendations regarding the number of training and experience hours required for those who treat patients with iodine-131 (I-131).

I have been treating many patients over the years with iodine-131. I received the training according to current guidelines that require 80 hours of training. The present requirements are very reasonable, and that is demonstrated by the exemplary 50 year safety record of endocrinologists using iodine-131 under the current regimen.

I understand that there are other groups that want to see the number of hours not doubled, not tripled, but to multiply ninefold to about 700 hours. This would be an excessive burden that would practically eliminate endocrinologists from treating their own patients. My clinical practice is devoted to the diagnosis and treatment and follow-up of patients with thyroid diseases. As involved as we are in the follow-up care of patients with thyroid diseases, we are very much in the best position to be using iodine-131 and monitoring its effects over our patients.

The 700 hour requirement would, therefore, jeopardize the health of patients, as patients who trust their endocrinologists, who are experts in the field of thyroid related disease, will be forced to go elsewhere for treatment.

I commend the NRC staff for taking the position that is fair and pro patient. I hope that the Commissioners will embrace their recommendation by leaving the current 80 hours rule in force. Thank you very much for giving consideration to my views.

Very truly yours,

Ruggero Battan, M.D.

Ruggero Battan, M.D.
Consultant, Endocrinology & Metabolism
Associate Clinical Professor, Michigan State University,
College of Human Medicine

RB:cm

9910250105 991015
PDR PR
20 63FR43516 PDR

1/0

DS10