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# MICHIGAN STATE UNIVERSITY

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USMPC



Department of Medicine  
Division of Endocrinology & Metabolism  
B220 Life Sciences Bldg.  
East Lansing, MI 48824-1317

'99 OCT 22 AM 10:44 Phone: (517) 353-3730  
FAX: (517) 353-5436

October 18, 1999

OFFICE  
FROM  
ADJUTANT

U.S. Nuclear Regulatory Commission  
The Honorable Chairwoman Greta J. Dicus  
016C1  
Washington, D.C. 20555  
Fax (301) 415-1672

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

Dear Ms. Dicus:

As a practicing clinical endocrinologist, I am writing to express my strong hope that you and the other Commissioners will concur with the NRC staff recommendations regarding the number of training and experience hours required for those who treat patients with Iodine-131 (I-131).

The proposal to maintain the current 80 hours training requirement is reasonable, and the exemplary 50-year safety record of endocrinologists using I-131 under the current regime is evidence that the present rule is sufficient for ensuring the safe administration of this radioisotope.

I understand that there are some groups who want to increase the number of hours to 700. This excessive and unnecessary regulatory burden would eliminate endocrinologists from treating their own patients because most practicing endocrinologists or fellows-in-training would not be able to meet this requirement.

Most importantly, the 700 hours requirement would ultimately jeopardize the health of patients, as patients who trust their endocrinologists – experts in the field of thyroid-related diseases – will be forced to go elsewhere for treatment.

I commend the NRC staff for taking a position that is rational, fair and pro-patient. I genuinely hope that the Commissioners will embrace their recommendation by leaving the current 80 hours rule in force.

Thank you for giving my views your careful consideration.

Sincerely,

Ved V. Gossain, M.D., FAC P, FRC P(c)  
Professor of Medicine  
Chief, Div. of Endocrinology & Metabolism

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