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U.S. Nuclear Regulatory Commission
The Honorable Chairwoman Greta J. Dicus
Chairwoman
016C1 Washington D.C. 20555

OFFICE OF
REGULATORY
ADJUSTMENT

DOCKET NUMBER
PROPOSED RULE PR 20, 32 + 35
(63 FR 43516)

Dear Madam Chairwoman:

I am a clinical endocrinologist in San Diego who has cared for patients with hyperthyroidism and thyroid cancer for approximately 20 years. During this time, I have administered I-131 to hundreds of my patients and have been an integral part of their therapy throughout the continuum of care, from initial diagnosis to follow up of the treatment.

The 80 hours of training which I received at Harvard Medical School as part of my endocrine training has served to be more than sufficient for the usage of the I 131. Most of the decisions regarding whether I 131 is used and how much is used depend on clinical circumstances that are much more the purview of clinical endocrinology. For example, we are the ones who must determine whether the degree of thyroid cancer is sufficient to warrant more or less aggressive treatment.

I understand that there are groups who wish to see the number of hours extended almost ten times to 700 hours! This is clearly excessive and unnecessary and would virtually eliminate clinical endocrinologists from the treatment of their own patients.

By eliminating endocrinologists from the treatment continuum, I believe this could seriously jeopardize the health of thyroid patients. Most of the errors and difficulties in these treatment plans have to do with the hand-offs from one provider to the next, and having a treating radiologist rather than the longstanding endocrinologist means the patient is clearly suboptimal.

I encourage the NRC staff for maintaining a position that is rational and in support of the best in patient care. I hope that you and the commissioners will accept their recommendations and leave the current 80 hours of education rule in force.

I appreciate your consideration of this letter. If further information input from me or my group would be helpful, please don't hesitate to let me know.

Respectfully,

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