

DOCKET NUMBER

PETITION FILE PRM

35-18

(70 FR 75752)

32

March 3, 2006

DOCKETED
USNRC

March 6, 2006 (12:15pm)

Attn: Rulemaking and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: Comments in response to Peter G. Crane Petition
Docket No. PRM-35-18

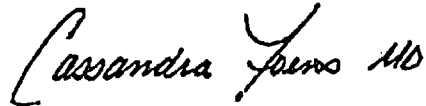
I am writing on behalf of the American College of Radiology (ACR) in opposition to the petition by Peter G. Crane (PRM-35-18). The ACR is a professional organization serving more than 32,000 radiologists, radiation oncologists, nuclear medicine physicians, and medical physicists, many of whom utilize I-131 in the treatment of their patients. As such, our members have an intimate knowledge of the needs and desires of their patients, and, by virtue of their substantial training and experience working with radiation, they are well versed in the effects of radiation and dosing considerations.

Notwithstanding the petitioner's characterization of the rulemaking process that eventuated the current patient release policies, the process was supported by science and guided by the advice of experts in medicine and medical physics. More importantly, the efficacy of the current release standard has been empirically borne out since the standard was adopted. The record of the earlier rulemaking, as well as other comments submitted to the current petition, is replete with references supporting the current release standard.

Given the well-established science substantiating the safety of the current standard, the added cost of reverting to the prior standard – increased healthcare costs, patient access concerns, and patient inconvenience – is clearly unwarranted. As always, the American College of Radiology welcomes the opportunity for continued dialogue with the NRC on areas

of mutual interest. Should you have any question on the comments addressed herein, or if we can otherwise be of assistance, please do not hesitate to contact Gloria Romanelli, Director of Legislative and Regulatory Relations with the ACR at 703-716-7550.

Sincerely,

A handwritten signature in black ink that reads "Cassandra Foens MD". The signature is written in a cursive, flowing style.

Cassandra Foens, M.D., FACR
Chair, Federal Regulatory Committee
American College of Radiology

From: Carol Gallagher
To: Evangeline Ngbea
Date: Mon, Mar 6, 2006 11:45 AM
Subject: Comment letter on PRM-35-18

Attached for docketing is a comment letter on the above noted PRM from Cassandra Foens, American College of Radiology Associates, that I received via the rulemaking website on 3/6/06.

Her address is:

American College of Radiology
1701 Pennsylvania Ave
Washington DC 20006

Carol

Mail Envelope Properties (440C6718.21E : 3 : 886)

Subject: Comment letter on PRM-35-18
Creation Date: 3/6/06 11:45AM
From: Carol Gallagher

Created By: CAG@nrc.gov

Recipients

nrc.gov
owf5_po.OWFN_DO
ESN (Evangeline Ngbea)

Post Office
owf5_po.OWFN_DO

Route
nrc.gov

Files	Size	Date & Time
MESSAGE	963	03/06/06 11:45AM
1661-0031.pdf	787843	03/06/06 11:42AM

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard