

PRM 35-19  
(71FR34285)



OKLAHOMA  
ONCOLOGY

specialists in the treatment of cancer

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USNRC

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August 21, 2006

August 23, 2006 (12:28pm)

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Attention: Rulemaking and Adjudications staff

Re: Comments to Petition for Rulemaking Submitted by Dr. Stein, Docket No. PRM-35-19

St. John Holliman Building  
1705 East 19th Street, Suite 201  
Tulsa, OK 74104-5404  
(918) 744-3180  
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William Medical Building  
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Tulsa, OK 74136-8320  
(918) 494-8275  
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Muskogee Hospital Cancer Center  
341 South 33rd Street  
Muskogee, OK 74401-5037  
(918) 682-1122  
FAX (918) 687-5883

Bartlesville Clinic  
224 Southeast DeBell Avenue  
Bartlesville, OK 74006-2305  
(918) 333-5308  
FAX (918) 333-6008

Claremore Clinic  
1220 North Florence Ave, Suite B  
Claremore, OK 74017-4201  
(918) 342-5103  
FAX (918) 342-2953

Tahlequah Cancer Center  
Clinic in the Woods  
1325 E. Boone St., #102  
Tahlequah, OK 74464-3349  
(918) 431-0441  
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I strongly support The Petition for Rulemaking (PRM) submitted by Dr. Stein (PRM-35-19) requesting that the NRC amend its regulations to recognize that an 80-hour training and experience requirement is appropriate and sufficient for medical oncologists/hematologists to attain AU status for the administration of Quadramet, Bexxar, and Zevalin. Each of these activity administrations is from a radiation safety perspective generally much less hazardous than oral <sup>131</sup>I administrations. The NRC has already stipulated and codified that any physician, most notably endocrinologists, can administer oral Na<sup>131</sup>I to treat thyroid disorders with only 80 hours of classroom and laboratory training (as well as appropriate work experience and written attestation). Administration of the agents specified in the petition is therefore, a medical issue rather than a radiation safety issue. I recognize that the petition refers only to activity administrations; any related imaging studies that may be required would obviously have to be performed by an appropriately authorized user, unrelated to the granting of this petition.

I believe therefore that unless this petition is granted expeditiously, the NRC will be intruding into the practice of medicine and unfairly discouraging a class of physicians from treating their patients; thus, limiting patient access to potentially very effective therapies and increasing health care costs without any appropriate radiation safety justification.

Sincerely,

G. Lance Miller, M.D.  
President and Medical Director  
Oklahoma Oncology, Inc.

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SECY-02

**From:** Amanda Holbrook <amanda@oklahoma-oncology.com>  
**To:** <SECY@nrc.gov>  
**Date:** Mon, Aug 21, 2006 11:49 AM  
**Subject:** Nuclear Regulatory Commission 082106

Dear Secretary,

Please read the attached letter regarding PRM-35-19.

Sincerely,  
G. Lance Miller, M.D.  
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