

TEXAS RADIOLOGICAL SOCIETY (50 FR 23960)

A Chapter of the American College of Radiology

USNRC

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

September 19, 1985

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTENTION: Docketing and Service Branch

Re: 10 CFR Parts 30, 40, 61, 70 and 72

To Whom It May Concern:

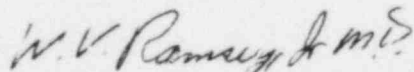
Dear Sirs:

We have recently been made aware of your proposal under the above numbers. We wish you to know that the Texas Radiological Society is totally opposed to this proposed rule making. At a time when medical costs have already escalated at an alarming rate throughout the entire United States and involving all aspects of medical care, this would add an additional financial burden to the ultimate consumer and, in our opinion, is not necessary under the current method of distributing and utilizing the majority of any medical radiopharmaceuticals. The short half-life and the small amounts utilized in medical diagnostic and treatment formats as well as the containerization utilized for these materials makes any spill that would be of significance extremely unlikely.

To add an additional financial burden throughout the chain of production and manufacturing and distribution and final utilization in our opinion, would pose an undue burden on certain companies and facilities that utilize radiopharmaceuticals for medical purposes. We do not believe that a need for this regulation has been demonstrated historically, nor do we believe that one can be projected to justify this nonproductive increase in cost.

Please note that the membership of the Texas Radiological Society is totally opposed to this potential requirement.

Sincerely yours,



W.V. Ramsey, Jr., M.D., President
Texas Radiological Society

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Acknowledged

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