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NEW YORK MEDICAL COLLEGE

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A Medical University

DEPARTMENT OF MEDICINE

Valhalla, New York 10595

DIVISION OF CARDIOLOGY
Westchester County Medical Center
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November 14, 1984

Secretary of the Commission
Office of Nuclear Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nuclear Cardiology licensing

Dear Sir:

I am writing as a concerned member of the American College of Nuclear Cardiology. I have several concerns regarding the proposed nuclear cardiology licensing changes. I support the position of the American College of Nuclear Cardiology. I would like to add my support to the following recommendations:

1. That nuclear cardiology procedures be listed as a specific sub part of Title X, CFR, Part 35 and a specific license category be listed in the revision of Title X, CFR as well as in the regulatory guide. The American College of Nuclear Cardiology should be consulted on the wording of this section.
2. That the proposed 10 CFR 35.920 be amended to include a statement that a nuclear cardiologists or other physicians who did not wish to be authorized to perform all nuclear imaging procedures will be evaluated based on their individual requests.
3. That the American College of Nuclear Cardiology be given the opportunity to work with the Advisory Committee on developing standards for nuclear cardiology.
4. That the Nuclear Regulatory Commission take no stands that appear to infringe on the practices of medicine and nuclear cardiology.
5. That the NRC refrain from requesting non pertinent financial information from applicants for licensure.

Thank you for your consideration.

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Sincerely,

Jeffrey W. Blake, M.D., F.A.C.C.
Assistant Professor of Medicine
Director, Nuclear Cardiology

JWB/jg
c.c. Charles H. Rose, Administrator
American College of Nuclear Cardiology

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