



Rodney D. Ice, Ph.D.
President

Joan E. Ice, B.S.
Executive Secretary

PROJECT NUMBER
PROPOSED RULE PR-30, 31, 32 et al (10)
(50 FR 30616)

Triar Enterprises

P. O. Box 3042

'85 SEP 23 P12:13

Edmond, Oklahoma 73083

September 24, 1985

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docking and Service Branch


Gentlemen:

With reference to proposed modification of 100FR 30, 31, 32, 35 and 40, please consider the following comments and suggestions:

1. The proposed usage of "dose" for amount of chemical administered and "dosage" for quantities of radioactivity will not alleviate the existing confusion of terminology. Rather than redefine, simply call the terms as needed, e.g. "absorbed dose" for your radiation biology illustration, "radiation exposure" or "Roentgens" for radiation safety and "administered radioactivity" for quantities of radioactivity.
2. Subpart J. Add under (a) be certified by:
 - (4) Board of Pharmaceutical Specialties in Nuclear Pharmacy. The rationale for this inclusion are:
 - a. This certification exceeds those requirements identified in your alternative (b).
 - b. The examination is exhaustive and performance based.
 - c. The examination process and mechanism has been shown to be scientifically sound; see Am. J. Pharm. Ed. 47/11-18/Spring 1983.
 - d. The pharmacy examination exceeds the requirements and supporting documents that warrant the American Board of Nuclear Medicine Science in Nuclear Medicine Science already included in your approved listing of certifying agencies.

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PDR PR
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Sincerely,


Rodney D. Ice, Ph.D.
Board Certified Health Physist

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