

UNIVERSITY OF KENTUCKY  
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PROPOSED RULE **PR-35(43 FR 29297)**

Bernard Singer, Chief  
Radioisotopes Licensing Branch  
Div. of Fuel Cycle and  
Material Safety  
Nuclear Regulatory Commission  
Washington, D.C. 20555

RESPONSE TO LETTER OF JULY 20, 1978 concerning amendment of NRC regulations for licensees:

- (1). Keep records of all misadministrations of radioactive material of radiation from radioactive material, and
- (2). Promptly report potentially dangerous misadministrations to NRC, to the patient's referring physician and to the patient or the patient's responsible relative.
  - A. Although the concept in principle is good, the degree is too minimal and the enforcement would be unattainable.
  - B. If the error is relative to therapy, patient and/or physician should be informed.
  - C. If the error is relative to diagnosis, need for reporting not indicated unless maximal permissible dose is exceeded.
  - D. Intra-institutional records of misadministration adequate except as indicated above.

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Acknowledged by card. 4/22 S.S.