

COLUMBIA RADIOLOGY ASSOCIATES

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August 9, 1978

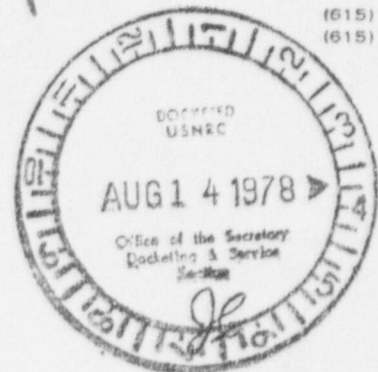
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DOCKET NUMBER
PROPOSED RULE

23
PR-35 (43FR 29271)

TP 102-3

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

Attention: Docketing and Service Branch

Dear Sir:

This is a request that you rescind the proposed rule 7590-01, requiring reporting of misadministrations of radionuclide materials.

First of all, there is ambiguity in the term "misadministration". Is a 14 millicurie dose instead of a 12 millicurie dose a misadministration? Is a subcutaneous injection instead of an intravenous injection a misadministration?

The reporting procedure would unduly alarm patients and many would be suspicious that any disease they contracted in the future would be caused by the radionuclide.

The added bureaucracy would cost the taxpayers more money with questionable gain.

Malpractice liabilities for radionuclide studies would undoubtedly go up. This cost would also be passed on to the patient.

For these reasons I emphatically urge you not to adopt the new regulations and not to consider other similar regulations for the future.

Sincerely,

Thomas R. Duncan, M.D.

Thomas R. Duncan, M. D.

TRD/jpo

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Acknowledged by card. 5/15 S.S.