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NRC PUBLIC DOCUMENT ROOM

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NOTED AND  
PROCESSED

-35(43FR29297)

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20013

Attention: Docketing and Service Branch

Dear Sirs:

I would like to comment on the subject of notification of the NRC for any misadministration of radioactive materials.

The suggested guidelines of 20% error from the intended dose for diagnostic purposes, and of 10% error from the intended dose for therapeutic purposes is too limiting. There are no definitive rules regarding dose administered and, hence, there are certainly larger variations than those suggested from facility to facility. Thus, a 20% error or misadministration at one facility may be considered acceptable or even a low dose at another! Yet, the implication of misadministration would certainly carry the connotation of "injury" to the patient.

Furthermore, I think that the legal ramifications may be more complicated than the situation warrants because there seems to be no absolute standards as a basis for judgement. I suggest that this proposal not become a regulation.

Sincerely,

*Nicholas A. Detorie*

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