



April 18, 2008

Robert J. Lewis  
Director, Division of Materials Safety and State Agreements, FSME  
Nuclear Regulatory Commission  
Mailstop 8 F24  
One White Flint North Building  
11555 Rockville Pike  
Rockville, MD 20555

RE: Appointment of a Diagnostic Radiologist to ACMUI

Dear Mr. Lewis:

I am writing as Chair of the Board of the American College of Radiology (ACR) to respectfully request that a diagnostic radiologist be added as a voting member of the Advisory Committee on the Medical Uses of Isotopes (ACMUI).<sup>1</sup>

Diagnostic radiologists perform a substantial number of the nuclear medicine procedures in the United States, and are a major component of the community. Physician practice information gleaned from 2003 Medicare data shows that 55 percent of board certified professional active radiologists perform nuclear medicine procedures as part of their clinical practice. In 2007, according to data from the certification boards, diagnostic radiologists accounted for approximately 50 percent of physicians certified and authorized user-eligible to enter the field of nuclear medicine, compared to 4 percent nuclear medicine physicians and 46 percent nuclear cardiologists.

Because the practice patterns and interpretive perspective of diagnostic radiologist are often substantially different from other authorized users, we believe the figures above demonstrate the importance of including a representative of the diagnostic radiology specialty on the ACMUI. Including a diagnostic radiologist on this advisory committee would bring an important perspective to ACMUI and will help to ensure that the unique concerns and interests of diagnostic radiology are heard as NRC contemplates regulations that impact the practice of radiologists. Indeed, during discussions at the October 22-23 ACMUI meeting, multiple ACMUI members expressed their agreement that diagnostic radiology should have a voice in the deliberations of the committee.

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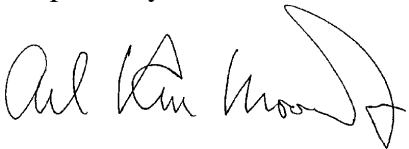
<sup>1</sup> The ACR is a professional organization serving more than 32,000 radiologists, radiation oncologists, nuclear medicine physicians, and medical physicists, who use radiation and radioactive material for the benefit of their patients.

I commend the NRC staff for agreeing to invite a diagnostic radiologist to attend meetings where training and experience discussions are a part of the planned agenda. However, such an approach falls short of what ACR and several of the ACMUI members believe is needed—namely, inclusion of a diagnostic radiologist as a permanent, voting member of ACMUI, for all matters coming before that committee.

If ACR can supply any additional information in support of this request or otherwise be of assistance, please do not hesitate to contact me, Gloria Romanelli, ACR Senior Director, Legislative and Regulatory Relations, or Michael Peters, ACR Regulatory Affairs Specialist, if our organization can be of assistance in this matter. Gloria and Michael can be reached at 202-223-1670.

Thank you in advance for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Arl Van Moore". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Arl Van Moore, MD, FACR  
Chair, Board of Chancellors  
American College of Radiology