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SHERTECH INC.

pharmacy services

Dockets Management System
US Dept of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001
Reference: RSPA - 99 - 6283 - 17

Gentlemen,

I am of the understanding that RSPA has proposed changes to the "IAEA Safety Standards Series, Regulations for the Safe Transport of Radioactive Material, 1996 Edition, No. ST - 1.", specifically additional requirements relating to transport by rail and by road.

The extended effect of these changes would adversely affect Nuclear Pharmacies and Radiopharmaceutical distribution in the U.S. In conjunction with other DOT regulations pertaining to vehicle placarding, this proposed change would both operationally and financially impact all Nuclear Pharmacies. It would require these facilities to employ driver personnel with only commercial drivers licenses and along with CDL drivers, as you know, comes both personnel and vehicle monitoring requirements.

The established safety record for transporting W-1 and Y-II packages in the US does not justify tightening the regulations to locally transport these packages to area hospitals and clinics. The increased cost of operation the proposed program would be passed through to those hospitals and clinics in the form of increased pharmaceutical costs to patients.

The cost of running a program such as this in 500 Nuclear Pharmacies throughout the US would be immense without any improvement in safety. I would ask the RSPA to reconsider the proposed changes in the SK-1 document in light of this new information and the global impact it would have to radiopharmaceutical distribution in the US. Thank you for your attention to this very important matter.

Sincerely,

Richard Sheriff, R.Ph.
Independent Nuclear Pharmacy Owner
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