

86290



## NATIONAL CENTRAL PHARMACY

June 28, 2000

RSPA 99-6283-30

TO: Docket Management System  
US Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590-0001

Fax: 202-493-2251

From: Mary Clark  
National Central Pharmacy  
3402 S. 14<sup>th</sup>  
Abilene, TX 79605

Phone: 915-695-0491

Fax: 915-695-0493

Re: RSPA-99-6283

The proposed regulation that would require placarding of all vehicles transporting W-I and Y-II would create many burdens on those associated with the delivery of RAM used in nuclear medicine, without any apparent improvement in safety. By limiting drivers to only those with a CDL, would create a burden on patients who need medication for an emergency scan, while time is taken in locating drivers and vehicles. Also, requiring a CDI, for any one transporting any labeled package would be a very definite change and expense in this area. The expense to each pharmacy and hospital for the additional training, monitoring, and maintaining a costly commercial drivers program at each facility would add significantly to the cost of these nuclear medicine products. Current regulations require training of all personnel handling/transporting RAM and this does seem sufficient for RAM used in nuclear medicine.

Sincerely,

Mary Clark, RPH  
National Central Pharmacy

DEPT OF TRANSPORTATION  
DOCKET CENTER  
00 JUN 29 PM 2:13