To some observers, however, this self-serving regulatory framework already exists.

Controversy over "Misadministration"

Dr. Marcus pointed out that the ACNP opposed both the NRC's original and revised quality management rule for misadministration, which she calls a "fraudulent NRC enterprise to conjure up violations," and "a direct intrusion into the practice of medicine" that falls outside the NRC's legal authority.

"At the present time, 80% of medical programs are receiving deficiency letters which, if not corrected within 30 days, will lead to 'violations' and fines. Fines on the order of thousands and tens of thousands of dollars are being issued for 'management failure' and the possibility that a 'misadministration' could occur because of 'violations' of the quality management rule. It constitutes a venomous 'open season' on medical licensees by an out-of-control agency that does not understand science, medicine, or integrity," said Dr. Marcus. The frequency of radiopharmaceutical misadministrations is extremely low (0.004%).

Philip O. Alderson, MD, noted that complaints lodged at ACR headquarters cite the NRC's lack of qualified medical inspectors who take an "overly

prescriptive and sometimes medically naive" approach. "Institutions following standards of both good clinical care and radiation safety are often cited for petty violations of the rules," he said.

"Punishing a licensee with fines and negative publicity should only be warranted when the NRC demonstrates willful neglect or wrongdoing," said Ralph P. Lieto, MSE, of the AAPM. Nuclear power experts dominate the NRC's management, said Mr. Lieto, resulting in a medical regulatory program that "suffers from a 'reactor mentality."

"The regulatory management of medical programs must be based on the science of the actual risks, which are small, rather than the public perception of radiation risk, which is unreasonably large," said Mr. Lieto. Any agency that regulates medical use of radiation should work to achieve "a consensus of minimum regulations without intrusion into the practice of medicine," he added.

Regulators often discuss measurements of risk, cost-effectiveness, and medical outcomes. Holding up a mirror to the NRC, Dr. Alderson noted that regulations themselves should be measured, and that any regulations found unsuccessful should be eliminated.

Linda E. Ketchum

SOCIETY MOVE TO HEADQUARTERS IN RESTON, VA, SUCCESSFULLY COMPLETED



New Environment Reflects Renewed Energy Within SNM

INCE OCTOBER 3, 1994, STAFF OF THE Society of Nuclear Medicine have been surrounded by the green landscape and natural beauty of Reston, Virginia, bathed by light from windows which enclose each story of the building—three sides on the first story and all four sides on the second. The doors of the Midtown New York office closed at 5:00 pm on Friday, September 30, and the Society reopened, fully operative, in the completely finished, two-story landscaped building in Virginia at 9:00 am on October 3. The transition was so smooth that the Society was able to hold a full meeting of the Executive Committee on October 8 and 9, including

dinner on site and a tour of the space.

That such a major move occurred so smoothly is testimony to the careful analysis, effective planning and efficient implementation that have characterized the efforts of members and staff alike since the decision to move was made in 1991.

Careful Analysis

Moving the SNM headquarters was deemed appropriate to reduce operating costs over the long term as well as to enable the Society to be in close proximity with and serve as a resource to the legislative, regulatory and professional organizations with which nuclear medicine interacts. Former SNM President Leon Malamud, PhD, headed the relocation committee formed to oversee the process, including site selection. Two studies conducted in 1991 helped focus the site selection.

The first study was designed to determine the short-term and long-term advantages and disadvantages of a number of locations, including Dallas/Ft Worth, Chicago, Philadelphia, New York City, and the greater Washington, DC, area, and narrowed the areas of consideration to suburban DC. The second study analyzed the costs of Baltimore and Rockville, Maryland, and Alexandria and Reston, Virginia, and further narrowed the areas of consideration to the two Virginia locations. Members of the relocation committee identified and reviewed suitable sites in these locations during the summer of 1993, unanimously agreeing that the 12-year-old Reston building best suited specified cost parameters and the desired potential for growth and expansion.

Effective Planning

The committee, which included SNM Executive Director Torry Mark Sansone, and several SNM staff members began the daunting tasks of construction buildout; engineering aspects of the buildout; property management and legal aspects; security systems, external lighting and renovations; inventory of office files and furniture; bids from various moving companies; and communication to the media and external organizations regarding the move.

John S, Childs, PhD, Director, Department of Communications Services, managed the construction buildout/remodeling. The architectural firm CORE Group, of Washington, DC, was guided by three principles established by the committee for the internal design: the design and layout of all staff stations should ensure that all staff experience natural light; the openness of the site should be used to advantage; and any landscaping should enhance the site's natural beauty. Both levels have

the expanse of windows described earlier, and interior walls of the offices that border exterior walls have approximately two feet of glass at the top, which spreads natural light further into the interior and enhances the unobstructed feeling of the space. An abundance of pine, cherry and pear trees are visible from within.

Mark Rogers, Director, Information Systems, coordinated and managed engineering aspects of the buildout, including telephone and computer cabling. Art Director Ellie Nigretto was responsible for external signage. Ernesto Aponte, Manager, Office Services, and David Ramos, Associate Coordinator, Leadership Services, inventoried office files and furniture. Steven Klein, Publications Production Manager, coordinated bids from moving companies to ensure smooth pickup and delivery of office furniture, files and other equipment as well as staff's personal belongings. Virginia Pappas, Associate Executive Director, contacted various media and external organizations to communicate the details of the move. Even staff who did not plan to move from New York were diligent in the effort to ensure a smooth transition. Former Director of Financial Service Chris Brogna coordinated property management and legal matters for the buildout as well as efforts to sublet the New York office space (whose lease expires on July 31, 1995); Robert Amoroso, former director, Membership Services, coordinated the new building's security systems and external renovations of the grounds and parking lot, along with Mr. Sansone and Mr. Rogers.

Efficient Implementation

The hard work and team spirit of committee members and staff paid off. Remodeling of the 22,000 square foot brick building began in early June and was completed before the end of August. Each department director had input into the design of his or her work area, and each department is built along functional lines. Thus, for example, Membership Services is an open area that facilitates the sharing of information; the Communications Department, which needs a quieter environment, is located away from the "hustle and bustle" areas of the office.

The move was completed in two phases. To ensure no disruption in publications scheduling, and because most staff with children starting school were in the publications area, the Department of Communications moved on August 28 and swiftly set up shop without scheduling delays. The rest of the departments moved on September 30, and, as noted earlier, were completely operational by October 3.

Newsline 27N

Part of the effective planning that contributed to efficient implementation was the initiation of recruitment efforts in June, for those positions held by staff whom SNM knew did not plan to move. Consequently, several key positions were filled before the actual moves, ensuring no gap in service, and individuals in these positions had the opportunity to benefit from orientation by departing staff. More than 20 new staff have been hired.

Renewed Energy for the Future

The move and the new environment have injected a renewed energy into the Society. The openness, the natural beauty and the functional nature of the space have enhanced the productivity of an already productive and enthusiastic

staff. Leaving long-time friends and colleagues was a bittersweet experience, but new staff members quickly integrated with existing staff, and the new SNM family is working efficiently and effectively. Moreover, one of the goals of the move—to reduce costs—already is being met. For the fiscal year beginning October 1, 1994, the Society cut operating costs by \$209,000 by virtue of the move.

The long journey initiated in 1991 has culminated in a prestigious office space that will save SNM substantial sums while creating an environment for change in which the Society's critical new initiatives can be tackled productively and effectively.

Maryanne Shanahan

News Briefs

International Suppliers of Molybdenum-99 Expand

Although worldwide production of 99Mo is commonly assumed to lie solely with AECL/Nordion International, Inc., Canada, a European firm—the National Institute of Radioelements (IRE)—has also been a longtime supplier. And when Mallinckrodt Medical's forthcoming production facility opens in 1995 (see Newsline July 1994,

p.25N), the resulting increase in international suppliers of this essential radioisotope may help calm fears of a possible shortfall.

An IRE spokesperson pointed out that the firm's Belgium-based plant, in operation since 1978, represents an alternative outlet for U.S. nuclear medicine physicians and scientists in obtaining 99Mo.

The IRE operation encompasses a purification plant and relies on irradiation of targets in four European research reactors. Distribution, however, remains

in the hands of Nordion Europe (NESA), with most of the company's production sold through NESA, which negotiates distribution agreements and market prices with potential consumers.

IRE's weekly production slightly exceeds 1,000 Ci, with possible increases in total capacity up to 3,000 Ci per week if a shortage were to occur. The two companies signed an agreement in 1993 in an effort to ensure a sustained supply of 99Mo, the terms of which provide for back-up if one or the other source experiences failure.

A Fable

(continued from page 3A)

"Does that take care of it?"No way. Although the authors claim that they are eager to get their manuscript published, they usually take a long time to make changes and return the revised manuscript. Eventually, though, some revised manuscripts are returned."

"What happens then?"

"Well, that is when you have to make the decision to accept or reject the papers. Of course, you could have them reviewed again. That will start the cycle all over."

"It sounds like fun."

"No, it is not. Everyone will complain regardless of what you do. If you reject a manuscript, the authors will complain. If you accept them, the readers will complain about the manuscripts you accept."

"It seems very frustrating. Why should I want to do this?"

"If you do it, you can write one page each month on whatever topic comes to mind."

"When do I start?"

- December 1994

Stanley J. Goldsmith, MD, Editor-in-Chief

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