

PRM-35-18  
(70FR75752)

# Endocrine Management Center

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USNRC

June 13, 2006 (11:25am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

## Endocrinology & Nuclear Thyroidology

Harvey V. Lankford MD, FACE

Ms. Annette Vietti-Cook  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

June 5, 2006

**Re: PRM-35-18: Release of patients treated with radiopharmaceuticals  
Support for the current Patient Release Rule, 10 CFR 35.75**

Dear Secretary Vietti-Cook and NRC:

As a Radioactive Materials Licensee, this office shares the NRC's commitment to the safe use of radiopharmaceuticals during patient care but has significant concerns regarding the recent petition seeking to amend the current regulation (10 CFR 35.75) governing the release of patients treated with more than 30 millicuries of radioactive iodine-131.

This office supports the current regulation and opposes the petitioner's request (Docket No. PRM-35-18) requesting the NRC prohibit the release of patients from radioactive isolation with more than 30 millicuries of radioactive iodine-131.

This office believes that there is no benefit to reversing or amending the present rule (10 CFR 35.75). In fact, this office believes that changing the current rule will have a negative impact on patient care and convenience as well as greatly increasing health care costs by mandating unnecessary hospitalizations for patients that pose no risk to the public health.

It is the current practice of treating physicians to conduct careful evaluations of patients and their home and work environment before exposing them to radiopharmaceuticals. That is certainly the practice here where our office is an exclusively-outpatient nuclear facility. Also, dosimetry calculations are performed on every patient before release. The total effective dose equivalent (TEDE) to any other individual from exposure to the released individual must not be likely to exceed 5 millisieverts (0.5 rem). This adherence to nuclear safety guidelines is required. NRC 10CFR 35.75

Radiation exposure to household members of patients who receive outpatient I-131 treatment ranging from 75 to 150 mCi of I-131 are well below the levels mandated by current NRC regulations (1). There is no compelling evidence to support the modification of the current Patient Release Rule (10 CFR 35.75). We respectfully request that the NRC continue supporting the current policy that is developed using evidence-based data and not be influenced by anecdotes.

Please feel free to contact us about this important topic at private line 804.288.0087

Sincerely,

  
Harvey V. Lankford MD

Nuclear Materials License NRC # 45-25177-01

1 Grigsby, P.W., Siegel, B.A. Baker, S., and Eichling, J.O. Radiation exposure from outpatient radioactive iodine (I-131) therapy for thyroid carcinoma. JAMA, 283:2272-2272, 2000.

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