Docket: NRC-2016-0122
Consolidated Guidance About Material Licenses: Program-Specific Guidance About Medical Use Licenses

Comment On: NRC-2016-0122-0002
Program-Specific Guidance About Medical Use Licenses; Request for Comments

Document: NRC-2016-0122-DRAFT-0004
Comment on FR Doc # 2016-29214

Submitter Information

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Submitter's Representative: Sally Schwarz
Organization: Society of Nuclear Medicine and Molecular Imaging

General Comment

See attached file(s)

Attachments

SNMMI_NRC_radiopharm_therapy_FINAL_2017
January 25, 2017

Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H8
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Docket ID NRC-2016-0122, Draft Program-Specific Guidance About Medical Use Licenses

Dear Ms. Bladey:

The Society of Nuclear Medicine and Molecular Imaging (SNMMI) would like to provide comments on the draft guidance announced in the Federal Register on December 6, 2016 (81 FR 87978). SNMMI's more than 17,000 members set the standard for molecular imaging and nuclear medicine practice through the creation of clinical guidelines, sharing evidence-based medicine through journals and meetings, and leading advocacy on key issues that affect molecular imaging and therapy research and practice.

SNMMI has reviewed the comments on Appendix U submitted on Jan. 6, 2017 by Siegel, Stabin, Marcus, and Sacks and supports the scientific contents of the letter. The society is willing to provide our expertise to NRC in order to appropriately revise the draft Appendix U for the benefit of patients, their families, and licensees. Additionally, the society encourages the NRC to consider the more than 20 published articles (see reference list below) dealing with patient release.

As always, SNMMI is ready to discuss any of its comments with the NRC. In this regard, please contact Caitlin Kubler, Senior Manager, Regulatory Affairs, by email at ckubler@snmmi.org or by phone at 703-326-1190.

Sincerely,

Sally Schwarz, MS, RPh, BCNP
SNMMI President
REFERENCE LIST


13. Siegel JA and Rutar FJ. Possibility of internal contamination from radionuclide therapy patients released according to 10 CFR 35.75. *RSO Magazine* 6:19-23, 2001


25. de Carvalho AB Jr, Stabin MG, Siegel JA, and Hunt JG. Comparison of point, line and volume dose calculations for exposure to nuclear medicine therapy patients. Health Phys 100:185-190, 2011