

SUNSI Review Complete

Template = ADM-013

E-RIDS=ADM-03

ADD=Sarah Lopas

COMMENT (21)

PUBLICATION DATE: 10/29/2018

CITATION: 83 FR 54380

Good afternoon!

We noticed that the NRC put out a Request For Information (RFI) regarding the Training and Experience Requirements for Different Categories of Radiopharmaceuticals (NRC-2018-0230). Thank you for taking this issue seriously and seeking to identify and address possible shortages.

As I'm sure you know based on our previous conversations, Congressman Carter is very interested in ensuring that the NRC considers geographic disparities and challenges, particularly for rural populations.

Given those concerns, can you please help us understand why the NRC does not appear to prioritize addressing those challenges. Specifically, the last section of the RFI appears to put the burden of identifying geographic disparities on commentators, even though the NRC presumably has a list of all AUs and could plot those locations on a map to determine geographic distributions. ("Are there certain geographic areas with an inadequate number of AUs. Identify those areas.")

This approach seems to miss some of critical shortages in rural communities. For example, the patient-to-primary care physician ratio in rural areas is only 39.8 physicians per 100,000 people, compared to 53.3 physicians per 100,000 in urban areas. The distribution among specialists is even more acute: while there are 263 specialists for every 100,000 in urban areas, that number drops to 30 specialists per 100,000 residents in rural areas. We assume that the distribution of physician Authorized Users and specialists is at best equal to this overall physician distribution. This means that there is likely a critical shortage of AU in rural areas.

If possible, I would also like an assessment of the number of authorized users in Georgia, and particularly Southeast Georgia, and their geographic distribution.

On a related note, we would like more information about why the RFI focuses exclusively on seeking to find an alternative pathway for physicians, and does not appear to consider nuclear pharmacists or other types of authorized users that could help fill this critical rural shortage.

Thank you very much for your attention to this critical issue.

Best,

Olivia Dickey

Health Policy Advisor

432 Cannon HOB | (P) 202-225-5831



McCloskey, Bridin

From: Belmore, Nancy
Sent: Friday, November 09, 2018 7:38 AM
To: Lewis, Antoinette; Craver, Patti; McCloskey, Bridin; Remsburg, Kristy
Subject: Letter from Congress
Attachments: 11-08-18 Letter from Rep Budgy Carter Re Radiopharmaceuticals.docx

Attached is an e-mail letter from Rep. Buddy Carter for necessary action.

Thank you,

Nancy Belmore
Office of Congressional Affairs
U.S. Nuclear Regulatory Commission
Nancy.belmore@nrc.gov
301-415-1776