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Training and Experience Requirements for Different Categories of Radiopharmaceuticals

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## **Submitter Information**

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## **General Comment**

As an AU for over 30 years with extensive experience with almost all of the currently available therapeutic radiopharmaceuticals (including Y90 microspheres, I-131, Ra-223, etc., but excluding Lutathera) I am very well aware of the how much attention and caution needs to be exercised when handling, storing, and administering these medications. The training for use of these materials should not be any less rigorous than it is currently. I am concerned that any reduction in the training and requirements for obtaining AU status for administration of specific therapeutic radiopharmaceuticals will create more opportunities for errors in prescribing and accidents during the handling of these agents. In addition oversight of a much greater number of facilities with authorized users may tax the NRC, NHPP, and state regulatory agencies.