PUBLIC SUBMISSION

SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD=Sarah Lopas

COMMENT (80)
PUBLICATION DATE:
10/29/2018
CITATION: 83 FR 54380

As of: 1/29/19 10:05 AM
Received: January 28, 2019
Status: Pending_Post
Tracking No. 1k3-97xv-a4yr
Comments Due: January 29, 2019
Submission Type: Web

Docket: NRC-2018-0230
Training and Experience Requirements for Different Categories of Radiopharmaceuticals

Comment On: NRC-2018-0230-0001
Training and Experience Requirements for Different Categories of Radiopharmaceuticals

Document: NRC-2018-0230-DRAFT-0086
Comment on FR Doc # 2018-23521

Submitter Information

Name: Anonymous Anonymous

General Comment

Radiotherapy is a totally different field as other treatment, which requires understanding and experience in radiophysics,
radiobiology, radiosafety. It is unlikely for a non radiology/Nuclear Medicine trained physician to become competent with
a limited hours of course. The current 700 hour requirement is already insufficient in my opinion. If the hour is further reduced,
the patient, the public and even the treating physician will be in jeopardy. There is no shortage of current AU to provide radiotherapy
such as I-131, Xofigo and Lutathera. If there is a possibility of difficult access to the treatment for patients in rural areas or
under service areas, the reasonable way is to arrange these patients to access qualified facility, rather than send AU with limited
training to those areas.