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**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

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## Submitter Information

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## General Comment

Appropriate training to be an authorized user requires the in-depth training curriculum established by the American Board of Nuclear Medicine, which consists of several years of training in an ACGME-accredited nuclear medicine training program and board certification. I am an American Board of Nuclear Medicine diplomate. Having several years of specific training and supervision in the use of radiopharmaceuticals and undergoing board examination to ensure appropriate knowledge is essential to protecting public health and safety. The NRC should not endorse lower standards out of a misguided belief that there are too few authorized users to supply the population's needs. Lack of insurance coverage is much more likely to reduce access than is lack of an available authorized user. The market is also quite capable of responding to the population's needs. Consider the case of Lutathera, in which 60 providing centers were established within 6 months of FDA approval of the agent. Complicated patients happen, and authorized users need the training and expertise to care for them well. A working knowledge of radiation safety is not the same as expertise in nuclear medicine diagnosis and therapy, and it's not enough to provide safe and expert patient care.