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Training and Experience Requirements for Different Categories of Radiopharmaceuticals

Comment On: NRC-2018-0230-0155

Draft Approaches for Addressing Training and Experience Requirements for Radiopharmaceuticals Requiring a Written Directive

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General Comment

Current regulations require that a nuclear pharmacy must have a pharmacist with Authorized User status to be present in the pharmacy during all hours of operation. Also, the Board of Pharmaceutical Specialties established the specialty in nuclear pharmacy in 1978, over 40 years ago. While all nuclear pharmacies comply with the Authorized User mandate, some nuclear pharmacies do not have a Board Certified Nuclear Pharmacist (BCNP) on staff. I think that there should be consideration that all nuclear pharmacies have at least on pharmacist with the BCNP specialty.