

May 13, 2019

Christian Einberg,
Chief Medical Safety and Events Assessment Branch
Division of Materials Safety, Security, State and Tribal Programs, ONMSS
U.S. Nuclear Regulatory Commission
Two White Flint North, 11545 Rockville Pike
Rockville, MD 20852

Dear Mr. Einberg:

On behalf of the American College of Radiology (ACR),¹ American Society for Radiation Oncology (ASTRO),² and Society of Nuclear Medicine and Molecular Imaging (SNMMI),³ we are writing to request an extension of the public comment period for the May 2, 2019 request titled, “*Draft Approaches for Addressing Training and Experience Requirements for Radiopharmaceuticals Requiring a Written Directive*” (NRC-2018-0230; 84 FR 18874).

Due to the seriousness of the concepts under NRC consideration and the potential long-term effects on the practice of medicine and the protection of public health and safety, we believe **an additional thirty days beyond the June 3, 2019 deadline** (for a total of sixty days) would better enable information collection, deliberation, and response development.

Thank you for your consideration of this request. For additional information, please contact Michael Peters, ACR Director of Legislative and Regulatory Affairs, at mpeters@acr.org; Cindy Tomlinson, ASTRO Senior Patient Safety and Regulatory Affairs Manager, at cindy.tomlinson@astro.org; and Caitlin Kubler, SNMMI Associate Director of Health Policy and Regulatory Affairs, at ckubler@snmmi.org.

Sincerely,



William T. Thorwarth Jr., MD, FACR
Chief Executive Officer
ACR



Laura I. Thevenot
Chief Executive Officer
ASTRO



Satoshi Minoshima, MD, PhD President
2018-2019
SNMMI

CC: Sarah Lopas, NRC
Lisa Cole Dimmick, NRC
Maryann Ayoade, NRC

¹ **ACR** is a professional organization representing more than 38,000 radiologists, radiation oncologists, interventional radiologists, nuclear medicine physicians, and medical physicists.

² **ASTRO** is the largest radiation oncology society in the world, with more than 10,000 members who specialize in treating patients with radiation therapies.

³ **SNMMI** has more than 17,000 members, including physicians, technologists, scientists, physicists, chemists and pharmacists, all participating in the field of nuclear medicine and molecular imaging.