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**SUNSI Review Complete** 

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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

**Document:** NRC-2018-0230-DRAFT-0161

Comment on FR Doc # 2019-08996

## **Submitter Information**

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## **General Comment**

Against Status Quo: 35.390 criteria is excessive for the role an AU has for radiation safety. Authorized users are part of a team of radiation safety officers, Nuc Med techs, regulators and administrators for NRC compliance. An AU is responsible for written directive criteria and being a member of the radiation safety committee.

There are not enough Treating Authorized Users:

Many AUs dont treat due to out of insurance network problems, practice bias for other therapys, schedule problems, competing forces and geographic limitations.