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Training and Experience Requirements for Different Categories of Radiopharmaceuticals

Comment On: NRC-2018-0230-0162

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

Document: NRC-2018-0230-DRAFT-0170

Comment on FR Doc # 2019-10760

Submitter Information

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Organization: American Osteopathic College of Radiology

General Comment

The American Osteopathic College of Radiology (AOCR) would like to comment on the proposed changes to 10CFR35.390.

The AOCR believes that rule should remain Status Quo as there is no reliable evidence to substantiate any change.

There are already appropriate pathways in place to become an Authorized User. As physicians, one of our goals is to do no harm. There is great concern that diluting the training & experience requirements would in fact, increase the opportunity for harm to the public.

We urge you to make no changes to the Training & Experience requirements for 10CFR35.390.