

# PUBLIC SUBMISSION

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**Docket:** NRC-2018-0230

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-0172

Comment on FR Doc # 2019-10760

## Submitter Information

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## General Comment

Related to: ID NRC-2018-0230

Against the status quo: it would help to have more treating options by allowing Radiologist or any Physician to be an

Authorized Users who meets the requirements within code 35.396

Also, please consider changing the wording of WI-DHS "157.64(1) limited to parenteral administration of any beta emitter or photon-emitting radionuclide with a photon energy less than 150 keV". This wording is very confusing for Ra-223 Xofigo AU's as it doesn't specify alpha emissions.