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# PUBLIC SUBMISSION

COMMENT (21)  
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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-0173

Comment on FR Doc # 2019-10760

## Submitter Information

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## General Comment

There are not enough authorized users:

The Current ACMUI Committee report was not accurate by stating that diagnostic radiologist could treat under 390. Diagnostic radiologist who are not currently on radioactive materials license or on one within seven years for a broad scope of radio therapies are approved for I 131 only.

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

Code 396 discriminates against Radiologist who have T&E as described in 35.394 which is identical to 35.396 criteria, but 396 is specific for certain Radiation Oncologist, limiting the patient access.