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# 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-0179

Comment on FR Doc # 2019-10760

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## General Comment

This NRC change is dangerous and detrimental to patient and practitioner safety. This NRC change, decreasing the number of training hours necessary, is dangerous and allows for preventable hazards to American and human health.

As a recent graduate of radiation oncology residency (completed within the past 1 month), I see firsthand the level of training needed, and decreasing the requirement is extremely dangerous. I have spent numerous hours studying prior to cases, in lecture and textbooks, only to learn from additional on-site practices that are critical for patient safety and treatment efficacy. I already feel nervous going out into the community and practicing, having learned with extreme diligence and preparation during and practiced with the greater number of hours (than the proposed change). Lowering the bar, which is the standard of training, is a threat to all our health and to the environment at large.

This NRC change is patently dangerous and undoubtedly will increase the risk to human health, the American community and the environment. Do not decrease the number of hours necessary to administer radiopharmaceuticals.

Thank you, and please do not hesitate to contact me if you have further questions.