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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-0185

Comment on FR Doc # 2019-10760

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General Comment

To Whom It May Concern:

I have worked with many healthcare professionals in my 20+ years as an NM technologist.

I have known of surgeons with on the job training for sentinel injections to squirt radiopharmaceuticals up in the

air to remove air from the syringe. This obviously delayed patient care and contaminated a surgical suite.

As I have talked with nurses and nurse practitioners who are ordering nuclear medicine studies, it is apparent that they

have very little idea of the specifics of nuclear medicine exams. I would not feel comfortable having these individuals giving

therapies to me or a patient. If anything, I believe there should be more training required, not less. I know that healthcare

professionals are dedicated, intelligent, and caring people, but I also know that I have a serious job that requires precise,

careful habits as well as meticulous record keeping. It requires training, schooling, and practice to develop those skills, and I don't think

patient safety or patient care would be improved by this change. Thank you for your time and for taking my comment.