

PUBLIC SUBMISSION

SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD=Sarah Lopas, Carrie
Crawford

COMMENT (36)
PUBLICATION DATE:
5/2/2019
CITATION: 84 FR 18874

As of: 6/28/19 11:27 AM
Received: June 28, 2019
Status: Pending_Post
Tracking No. 1k3-9aqe-cnmy
Comments Due: July 03, 2019
Submission Type: Web

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-0187

Comment on FR Doc # 2019-10760

Submitter Information

Name: Anonymous Anonymous

General Comment

Against status quo: Tailored limited use for authorized users has been in place within code 35.392 and should be, based on this precedent, the foundation for a limited use code for radium 223.

392 is for I131 only with only 80 hours of T & E.

This code has been in existence for years and has been highly successful even though I 131 is a complex radiotherapy from a clinical, radiation safety and handling consideration.

Radium 223 is much less complex.

Radiation safety has worked well within 392 because of the system for NRC compliance consisting of radiation safety officers, nuclear medical technologist, regulators, hospital clinic administrators and authorized users.