

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

PUBLIC SUBMISSION

COMMENT (42)
 PUBLICATION DATE:
 5/2/2019
 CITATION: 84 FR 18874

As of: 7/2/19 9:25 AM Received: July 01, 2019 Status: Pending_Post Tracking No. 1k3-9asn-vaph 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-0193

Comment on FR Doc # 2019-10760

Submitter Information

Name: Greg Morrison

Address:

American Society of Radiologic Technologists
 15000 Central Ave. SE
 Albuquerque, NM, 87123

Email: gmorrison@asrt.org

General Comment

July 1, 2019

Daniel S. Collins Director, Division of Materials Safety, Security, State, and Tribal Programs
 Office of Nuclear Materials Safety and Safeguards
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555-0001

Re: Docket ID NRC-2018-0230-0001, Training and Experience Requirements for Different Categories of Radiopharmaceuticals

Dear Mr. Collins:

The American Society of Radiologic Technologists represents nearly 156,000 medical imaging and radiation therapy professionals. ASRTs membership also includes nearly 4,700 nuclear medicine technologists, the professionals who mix, prepare and administer imaging and therapeutic radiopharmaceuticals and operate and

monitor the equipment used to image the movement and distribution of these radiopharmaceuticals within the body.

A number of nuclear medicine technologists have contacted ASRT and expressed concern about the Nuclear Regulatory Commissions proposal to reduce training and experience requirements for physicians administering radiopharmaceuticals.

ASRT researched the NRCs Draft Approaches for Addressing Training and Experience Requirements for Radiopharmaceuticals Requiring a Written Directive and determined that the proposed changes would compromise the safety of patients, their caregivers and family members. As a result, the ASRT opposes the proposed changes.

Radionuclide therapy can be dangerous if administered incorrectly. As with other radiologic procedures that use medical radiation, it is vital that physicians and nuclear medicine technologists with extensive levels of training and experience perform radionuclide therapy.

The NRCs recommendation to reduce the number of personnel training and experience hours for an authorized user from 700 to 400 is alarming. Authorized users who can administer radiopharmaceuticals under an NRC license have followed the 700-hour requirement for years, and it has resulted in exemplary patient care.

ASRT strongly believes that everyone involved in the administration of radiopharmaceuticals must be educationally prepared and clinically competent to do so. The current NRC requirements ensure that the physicians and the nuclear medicine technologists who assist them are prepared to provide safe and high-quality patient care. As such, ASRT disagrees with the proposed changes to the physician requirements.

ASRTs position on this measure aligns with the Society of Nuclear Medicine and Molecular Technologists, which represents 17,000 members, including physicians, technologists, scientists, physicists, chemists and pharmacists, all participating in the field of nuclear medicine and molecular imaging.

ASRT encourages the NRC to adopt the A. Status Quo option in the NRCs Draft Approaches for Addressing Training and Experience Requirements for Radiopharmaceuticals Requiring a Written Directive, which presents no changes to the current training and experience requirements.

Sincerely,

Sal Martino, Ed.D., R.T.(R), FASRT, FASAE, CAE
ASRT CEO and Executive Director

Attachments

ASRT_Ltr_CollinsNrc-2018-0230-0001_20190701

July 1, 2019

Daniel S. Collins Director, Division of Materials Safety, Security, State, and Tribal Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Docket ID NRC-2018-0230-0001, Training and Experience Requirements for Different Categories of Radiopharmaceuticals

Dear Mr. Collins:

The American Society of Radiologic Technologists represents nearly 156,000 medical imaging and radiation therapy professionals. ASRT's membership also includes nearly 4,700 nuclear medicine technologists, the professionals who mix, prepare and administer imaging and therapeutic radiopharmaceuticals and operate and monitor the equipment used to image the movement and distribution of these radiopharmaceuticals within the body.

A number of nuclear medicine technologists have contacted ASRT and expressed concern about the Nuclear Regulatory Commission's proposal to reduce training and experience requirements for physicians administering radiopharmaceuticals.

ASRT researched the NRC's *Draft Approaches for Addressing Training and Experience Requirements for Radiopharmaceuticals Requiring a Written Directive* and determined that the proposed changes would compromise the safety of patients, their caregivers and family members. As a result, the ASRT opposes the proposed changes.

Radionuclide therapy can be dangerous if administered incorrectly. As with other radiologic procedures that use medical radiation, it is vital that physicians and nuclear medicine technologists with extensive levels of training and experience perform radionuclide therapy.

The NRC's recommendation to reduce the number of personnel training and experience hours for an authorized user from 700 to 400 is alarming. Authorized users who can administer radiopharmaceuticals under an NRC license have followed the 700-hour requirement for years, and it has resulted in exemplary patient care.

ASRT strongly believes that everyone involved in the administration of radiopharmaceuticals must be educationally prepared and clinically competent to do so. The current NRC requirements ensure that the physicians and the nuclear medicine technologists who assist them are prepared to provide safe and high-quality patient care. As such, ASRT disagrees with the proposed changes to the physician requirements.

ASRT's position on this measure aligns with the Society of Nuclear Medicine and Molecular Technologists, which represents 17,000 members, including physicians, technologists, scientists, physicists, chemists and pharmacists, all participating in the field of nuclear medicine and molecular imaging.

ASRT encourages the NRC to adopt the A. Status Quo option in the NRC's *Draft Approaches for Addressing Training and Experience Requirements for Radiopharmaceuticals Requiring a Written Directive*, which presents no changes to the current training and experience requirements.

Sincerely,



Sal Martino, Ed.D., R.T.(R), FASRT, FASAE, CAE
ASRT CEO and Executive Director