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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-0194

Comment on FR Doc # 2019-10760

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General Comment

I do not think there should be any changes in the existing training requirements for Radiopharmaceuticals. I would not change the required hours from 700 to 400. I do not feel this is adequate training and would put patients at risk for errors. There are more than enough trained Radiation Medicine physicians to handle the workload at this time. I would have concern that non physicians could be licensed for these procedures which could be dangerous to patient care. Only properly trained physicians can handle radioactive materials safely and can properly manage patient issues. This includes monitoring blood counts and symptoms like nausea and vomiting and diarrhea. I agree with the comments filed by the AMA,ASTRO, ACR, and ACRO.