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Release of Patients Administered Radioactive Material

Comment On: NRC-2019-0154-0003

Release of Patients Administered Radioactive Material; Extension of comment period

Document: NRC-2019-0154-DRAFT-0017

Comment on FR Doc # 2019-17060

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General Comment

Please, find attached our comments on NRC draft regulatory guide on release of patients after administration of radiopharmaceuticals.

Respectfully,

University of California Los Angeles

Nuclear Medicine Team

Attachments

UCLA_Comments_on_NRC_DG-8057-Patient-Discharge_09-23-19



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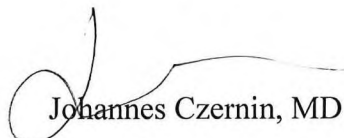
Dear Sir/Madam:

We are submitting comments on Draft Regulatory Guide DG-8057. It is with much concern that we reviewed the recent draft revision of the regulatory guide on release of patients after administration of radiopharmaceuticals. The reiteration of the antiquated 33 mCi rule, whereas the 500 mrem calculated dose limit has been established as a more scientifically sound dose limit, and the interchangeable use of a 100 mrem and 500 mrem dose limit is alarming. Also many of the patient instruction recommendations are poorly medically informed. It is a surprise to us that this draft guide lacks reference to the relevant existing body of scientific literature pertaining to this topic. A short list of these peer-reviewed publications is included at the end of this comment letter.

The overly conservative draft guidance is particularly counter-productive for out-patients, provoking needless anxieties, pointless inconvenience, or even delay of their radiotherapies.

Along with other already provided in-depth comments to the Draft Regulatory Guide DG-8057, we strongly advocate for a complete revision of this document with inclusion of outside input from experts in internal and external dosimetry, incorporation of complete list of relevant scientific literature, and comprehensive consultation with nuclear medicine medical community.

Respectfully,

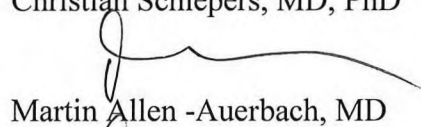

Johannes Czernin, MD



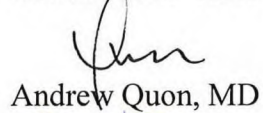
Heinrich Schelbert, MD, PhD



Christian Schiepers, MD, PhD



Martin Allen -Auerbach, MD



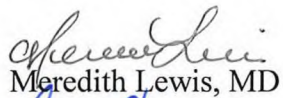
Andrew Quon, MD



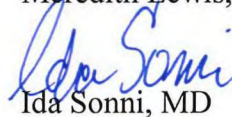
Shadfar Bahri, MD



Aria Razmaria, MD



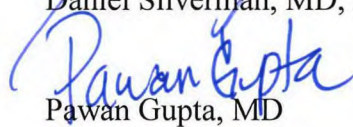
Meredith Lewis, MD



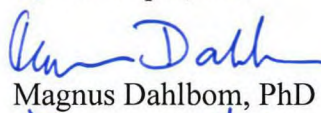
Ida Sonni, MD



Daniel Silverman, MD, PhD



Pawan Gupta, MD



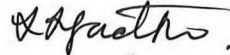
Magnus Dahlbom, PhD



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Linda Gardner, BSN, RN, VA-BC