



Inform ■ Educates ■ Advocates

September 11, 2019

Mr. Thomas H. Boyce
Chief, Regulatory Guidance and Generic Issues Branch
Division of Engineering
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Draft Regulatory Guide DG-8057, Docket ID NRC-2019-0154, "Release of Patients
Administered Radioactive Material (proposed Revision 1 to RG 8.39)"

Dear Mr. Boyce:

The National Funeral Directors Association (NFDA) appreciates the opportunity provided by the U. S. Nuclear Regulatory Commission (NRC) to comment on the NRC's draft regulatory guide DG-8057, further identified above. NFDA is the world's leading and largest funeral service association, serving more than 20,000 individual members who represent nearly 11,000 funeral homes in the United States and forty-nine countries around the world. Through education, information and advocacy, NFDA is dedicated to supporting members in their mission to provide families with meaningful end-of-life services and to educating members as to issues involving their health and safety and protection of the environment and the families they serve.

Among other proposed changes, the draft guide, Revision 1, includes a new Section 2.4 entitled "Death of a Patient Following Radiopharmaceutical or Implants Administration." Section 2.4 is a good initial step in recognizing that funeral directors and crematory operators need to be informed (1) when the remains of a decedent in their care contains "therapeutic quantities of radioactive materials" and (2) of appropriate precautions to minimize radioactive exposures and radioactive contamination for embalming, burial and cremation. However, NFDA considers it critically important for its members to receive this information promptly in order to protect themselves in treating the remains and to ensure that family members, particularly those who may have compromised immune systems, are pregnant or breast feeding, etc. are not exposed to radiation when viewing or touching the remains. There are no suggested times frames referenced in the guide for communication of this information.

The guide suggests that it is for the Radiation Safety Office at the treating institution to provide such information to the funeral director and the crematory operator and to determine on a case by case basis what information to provide. However, this approach does not ensure that funeral directors and crematory operators receive the needed information before or immediately upon receipt of the remains. Also, the guide does not specify the kind and quantum of information to be provided.

In some situations, the Radiation Safety Office may not be informed of the patient's death. In that case, the funeral director or crematory operator will be dependent upon the family or caregiver to disclose that the decedent had radioactive treatment. Funeral directors and crematory operators do not

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ADD: Harriet Karagiannis, Vered
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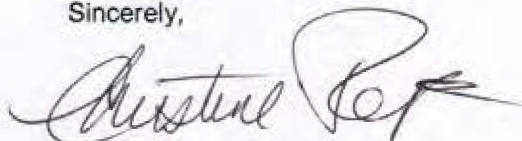
COMMENT (17)
PUBLICATION DATE: 7/26/2019
CITATION 84 FR 36127

routinely receive reliable and sufficiently detailed information from family members of the deceased, the treating medical practitioner, the radiation safety officer at the treating institution or others that the remains contains radioactive material, what kind of material, its half-life, and the risks of exposure from that material. This means that a funeral director or crematory will not necessarily know whether precautions should be taken to minimize radiation exposure and radioactive contamination when embalming, burial, and/or cremation are conducted.

For that reason, NFDA also suggests that the Patient Precautions discussion in Section 2.3.2(b) (p.16) include both a written description of the treatment that the patient has received and a statement that, in the event of death, the family member or caregiver immediately advise the funeral home or crematory operator of the nature of the treatment and also that the funeral director or crematory operator contact the Radiation Safety Office immediately for further instructions. This approach would close some of the communication gaps in the process and go further to ensure that the funeral director or crematory operator will receive adequate information about treatment and needed precautions.

NFDA appreciates the opportunity to offer these comments and would be pleased to discuss this further with NRC staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Pepper", with a stylized flourish at the end.

Christine Pepper, MBA, CAE
Chief Executive Officer

CP/mcl