

March 16, 2020

Chairman Kristine L. Svinicki
Commissioner Jeff Baran
Commissioner Annie Caputo
Commissioner David A. Wright
Margaret Doane, Executive Director for Operations
Marian Zobler, General Counsel
Annette Vietti-Cook, Secretary

Dear Chairman Svinicki, Commissioners, Ms. Doane, Ms. Zobler, and Ms. Vietti-Cook:

Given the national health crisis that we are in, I would like to ask that all work on my petition for rulemaking on the patient release issue be put on temporary hold. In the first place, at a time when hospital capacity promises to be stretched to the breaking point, we need to preserve the status quo for the time being. I would much rather have the employees of the NRC, some of whom are personal friends, safely at home with their loved ones, in self-quarantine, than coming to their offices to work on anything of less than the most immediate urgency. By the same token, I would like to ask for a freeze on the consideration of the work of the Advisory Committee on the Medical Uses of Isotopes on the patient release issue. Basically, the ACMUI and NMSS management appear as adamant as always that they know more about the health risks of internal doses of iodine 131 ("small or negligible" says the most recent draft ACMUI subcommittee report, dated February 24, 2020) than the Centers for Disease Control, which said this in 2002:

Exposure to I-131, especially in childhood, increases the risk for hypothyroidism, thyroid nodules, and cancer. ... A child's thyroid dose from ingestion can be up to 20 times that of an adult because the same amount of energy is deposited in a smaller tissue mass. A child's thyroid dose from inhalation can be twice that of an adult, and is 15-20 times higher than the overall dose to the rest of the body.

Is this the moment in our national history for an agency without a single medical doctor on its staff to go on record declaring that it knows better than the CDC on an issue of public health? There are also serious procedural questions as to whether the ACMUI has afforded adequate notice of its activities on this issue, but they too can wait for another time.

I wish good health to all, and to their loved ones, and hope to hear soon that the NRC has decided to keep as many employees as possible at home, for their own and others' safety.

Respectfully submitted,

/s/

Peter Crane, NRC Counsel for Special Projects (retired)