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Docket: NRC-2020-0141

Reporting Nuclear Medicine Injection Extravasations as Medical Events

Comment On: NRC-2020-0141-0004

Reporting Nuclear Medicine Injection Extravasations as Medical Events; Notification of Docketing and Request for Comment

Document: NRC-2020-0141-DRAFT-0115

Comment on FR Doc # 2020-19903

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General Comment

I am petitioning Docket ID NRC-2020-0141. Reporting nuclear medicine injection extravasations as medical events covers the most harmful radiotracer infiltrations which are radioisotopes that are beta emitting or alpha emitting or high dose gamma emitting therapeutic agents that already require written directives.

In nuclear medicine, patients generally receive gamma ray emitting radiotracer which has very negligible effects on the skin if infiltrated and is not at risk of being harmful; as these patients are already receiving a higher amount of radiotracer for imaging purposes. The only exception to a non written directive gamma emitting diagnostic agent would be Thallium 201, which is not as widely used as it once was. This is not enough reason to make such a drastic change in policy which would in turn punish technologist without the effects of changing patient care. This petition is also assuming nuclear medicine technologists don't already uphold quality in injection techniques compared to other modalities, or assuming other modalities

extravasations are less harmful to patient safety.

Other modalities/departments administering CT contrast, MRI contrast and Nurses administering medications in inpatients with faulty IV's, put patients at higher risks of toxicity and harmful effects, and are less regulated. Nuclear Medicine extravasation is not as harmful to patient safety as this petition states, nor has as many harmful effects in comparison to these other modalities listed. Thus the NRC already plays a role in monitoring medical events and there should be no further attention paid to this department other than what has already been put into place up to now.

These comments are referenced from the Journal of Radiological Protection, article: Guidance on prevention of unintended and accidental radiation exposures in nuclear medicine

Link listed below:

<https://iopscience.iop.org/article/10.1088/1361-6498/ab19d8>