

# PUBLIC SUBMISSION

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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-0209

Comment on FR Doc # 2020-19903

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## General Comment

RE: ID NRC-2020-0141

As the spouse of someone who is chronically ill, I know that diagnostic tests are extremely important. Diagnostic tests are supposed to help identify issues and illnesses, not be the cause of significant illness themselves. If you are in a position where you require the need to complete a diagnostic test, something is already causing you trouble. It is incomprehensible that a diagnostic test could end up causing more issues than benefits for the person having the procedure, and that any negative issues associated with the test may not be reported.

The philosophy that extravasations are nearly impossible to avoid and the idea that not much can be if they occur is extremely outdated (from the 1980's). The idea that patients do not have to be notified if extravasation takes is dangerous. The regulatory guidelines that are in place regarding this issue are directly putting people at risk. Patients are potentially missing a diagnosis or have to re-take a diagnostic test when extravasation occurs. When extravasations take place, patients are at risk for cancer, may experience severe tissue issues at the site of injection resulting in permanent damage, or may lose the important opportunity to receive therapy for the issue they were being tested for in the first place.

Please change the policy on reporting and for the regulations to prevent extravasations and allow patients more transparency and information about their bodies and care.

It is important that transparent reporting take place and that patients' rights are supported. We are talking about injecting a patient with radiopharmaceutical material into their body and not telling them. There is more that can be done to prevent patients from being harmed. Change the regulation to do better by patients.