

# PUBLIC SUBMISSION

<b>As of:</b> 10/22/20 4:56 PM
<b>Received:</b> October 21, 2020
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1k4-9jna-drza
<b>Comments Due:</b> November 30, 2020
<b>Submission Type:</b> Web

**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-0235

Comment on FR Doc # 2020-19903

---

## Submitter Information

**Name:** Michael Connelly

---

## General Comment

I am writing to urge the Commission to adopt the recommendations made in the petition that is the subject of Docket: NRC-2020-0141.

I urge the NRC to take action so that radiopharmaceutical extravasations that exceed the reporting limit get reported to you, the patient, and the patient's physician. In executing its regulatory responsibility to protect the safety of the citizens of our Nation when isotopes are used medically, this is critical information for the Commission to collect. Not collecting information on harmful practices clearly will not find them, and as a result of not collecting, will not fix them if needed.

The NRC, like most regulators, is in a delicate balance with the industry that it regulates. That is the case here and the subject of this Docket. However, the Commission's very reason for existence is to navigate this balance for the ultimate protection of the Nation's citizens. The Commission cannot avoid collecting or inquiring about bad news from industry, if such bad news exists. Even to the dismay of industry.

We have before us an unfortunate example of the regulator-industry partnership getting things terribly wrong. The FAA appears to have relied too heavily on Boeing to ensure the safety of a new airplane model, perhaps because of their long history of successes, in the 737MAX case. The participants did not want airplanes to crash. But they did. So now they are working to fix the 737MAX and the regulatory process that permitted its premature certification. The NRC is not FAA. However, reflecting on the misfortunes of a sister agency is surely beneficial for all regulators, in their efforts to avoid similar outcomes.

Extravasations have the potential of harming patients. Patients and their physicians have the right to have such information reported to them if they occur. The Commission itself needs to know when these happen. Accordingly, I urge the Commission to adopt the recommendations of Docket NRC-2020-0141 and to find out.

Sincerely,  
Michael Connelly  
Spokane, WA