

# 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-0379

Comment on FR Doc # 2020-19903

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

My position is based on the following facts:

This petition was submitted by Ron Lattanze, the CEO of Lucerno Dynamic, whom has a background in business, and Lucerno dynamics will significantly benefit financially from this regulation change.

Lucerno Dynamics contributed \$80,000 for lobbying in 2020, and The Senator which writes a letter in support is from the state of which Lucerno Dynamics operates.

In my opinion the winner is Lucerno Dynamics and the losers are cancer patients. The company uses fear mongering, and misleading information on their website to scare the public into supporting their cause. Fact, approximately 600,000 United States Citizens die each year from cancer. Every year 0 people are harmed by radiation in diagnostic doses of nuclear medicine agents. Promoting fear and misleading information into a community of people whom rely on molecular imaging for cancer treatment is reprehensible. Promoting fear around participating in cancer treatment programs including PET/CT imaging can have real impacts on people, cause real pain and suffering, and poorer outcomes.

An important distinction on the subject is the difference between isotopes used for imaging, and isotopes used for therapies. Imaging isotopes used within current NRC guidelines are relatively harmless. Certain isotope therapies however are designed to cause tissue damage to treat conditions like cancer. During therapy procedures, extensive safety protocols and regulations are employed to make sure the drug is delivery to the appropriate target. My position is that further regulation in not necessary in therapies, however I would support it if there is a safety

concern. I am vehemently opposed applying any further regulations on imaging doses, because they do not pose a safety concern.