

# 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-0431  
Comment on FR Doc # 2020-19903

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## General Comment

See attached file(s)

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## Attachments

November 26

November 26,2020

In 1995, my father was diagnosed with Lung Cancer. My father was a smoker for much of his adult life and had quit 10 years prior to his diagnosis. Unfortunately, the effects of the habit had already wreaked havoc way before his will to quit. He passed away 3 years later, living the entire timeframe the doctor gave him to survive the disease.

I was a young freshman in college when we were given the news, a couple of months fresh into my college career. It was my first time away from family, EVER. Barely learning the ways of life, now grappling with how to take care of my ailing father.

My family were not well off. We are an immigrant family who left the terrors of the Vietnam war. Our entire family fled in the middle of the night in order to avoid being caught by the communists. Looking for a new life, my parents fled and left everything they had, renouncing their citizenship to the only country they knew so that they could give their 7 children something better than what they had.

I spent the next 3 years coming home every weekend, so that I could relieve my mother from taking care of him. For a college student who should have spent winter breaks skiing, or partying it up in some location for Spring Break, I was home in Los Angeles, going to the LA County Hospital, taking my father to his countless Chemotherapy appointments, radiation appointments, MRI's and all his PET scans.

Which leads me to why I am writing to you today. Being a young impressionable college student, I was in such awe of the amazing technology for medicine. I remember looking at his scans and marvel at how someone looking at them could make a decision on my father's condition. Never in my mind would I have thought he had to have been injected with radioactive material that somehow worked perfectly in his body so that his oncologist could give him a proper prognosis. Luckily for my father, or at least I would like to think so today, although I would never know otherwise, the radioactive material was properly injected so that the oncologist made the right health decision for him.

After graduation, I went on to work for a medical device company. The very same company that manufactured the infusion pump used to infuse chemotherapy into him. I quickly learned Medical companies are heavily regulated by the FDA for reportable events. If you are a manufacturer or importer of a device that malfunctions that is likely to cause or contribute to a death or serious injury, you are mandated to report the event.

Which is why the NRC exemption policy is, to say the least, completely mind blowing to me. How is it mandatory for device manufacturers to be held to a higher standard than the process of radioactive material injected into one's body? How is it that patients are not given the same level of human decency for their life?

When I was a young college student, I always believed in the progression of medical devices and it's uses. I still believe this today. Advancements of technology and devices would allow us to advance healthcare in many ways. Even detection of extravasations. Completely contrary to your ruling back in 1980, that they are "virtually impossible to avoid"

I write you my personal story to paint the picture that these decisions effect real people. Real people with a desperate and instinctual will to fight to live. Don't let your antiquated ways of thinking what is impossible, still impossible. People like my father who first hears the word cancer don't ever say that fighting for their life is impossible.

I also write to you so that I can advocate for families like mine. Cultural and language barriers hinder these families to advocate for their own safety. They may lack the understanding of how policies such as this affect how medicine is being practiced on them.

It is the civic duty and honor in your lifetime to make the right decisions for today and tomorrow. I urge you to rethink what is impossible... possible. I urge you to think of the 100's of thousands of people in this country who rely on the safety of nuclear medicine.

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