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General Comment

Dear members of the Nuclear Regulatory Commission committee,
I am a PhD level cancer researcher and have also been a cancer patient that has undergone FDG-PET imaging. I was surprised and disappointed to learn that extravasation events are exempted from NRC reporting. I was also concerned to learn that such events can occur without the patient being informed or the full extent of the extravasation evaluated. As a researcher who works with beta emitters, I am asked to maintain diligent records of their use and disposal. Yet it seems that once they enter the patients body, that careful due diligence is no longer considered important. Evaluating extravasation extent and radiation exposure is not a challenging task and if thresholds of local radiation exposure are reached, I believe these should be reportable events. I believe that establishing a clear exposure threshold and monitoring practices are within the abilities and responsibilities of the NRC. I do not believe there should be a blanket exemption for all extravasations, regardless of the scope of exposure. Patients have the right to know the extent of their exposure and to be equipped to monitor for health effects that could take years, in the case of cancers, to develop. Thank you for the opportunity to comment on this issue.