



June 25, 2021

To Whom It May Concern:

We contact you on behalf of nuclear medicine patients across the United States to respectfully ask the Nuclear Regulatory Commission to adopt the recommendations made in the petition in Docket: NRC-2020-0141. We believe that patients, their physicians, and the NRC should all be made aware of radiopharmaceutical extravasations that exceed the reporting limit.

While we understand that nuclear medicine procedures are commonly used to support cardiology, neurology, and many other types of patients, our organizations are specifically dedicated to supporting patients coping with cancer. Indeed, a number of us are not only advocates, but we are also cancer survivors. Therefore, we view the issue of radiopharmaceutical extravasations through the prism of the patient.

The importance of nuclear medicine in the correct diagnosis and treatment of patients with cancer cannot be overstated. It can literally mean the difference between life and death. When an extravasation compromises diagnostic images, a resulting misdiagnosis can take a patient down the wrong treatment path. However, for cancer patients, time is of the essence. The idea that information regarding an extravasation should continue to be kept from the patient and their physician is simply unacceptable.

The advances made in cancer treatments over the past 40 years are truly extraordinary and have extended the lives of countless patients. Nuclear medicine plays a vital role in cancer diagnosis and treatment. However, we know that in addition to the effects on nuclear medicine images, radiopharmaceutical extravasations can inadvertently irradiate patient tissues with doses that far exceed the reporting limit (0.5 Sv) and the threshold that the nuclear medicine community says will lead to adverse tissue reactions (1.0 Sv). We also know that these significant extravasations that exceed the reporting limit happen far more often than they should, even though they are preventable.

We further believe the NRC should be aware of significant extravasations. The agency is responsible for protecting patients during procedures involving the use of isotopes. Unfortunately, the current problem is compounded by a lack of reporting. There is no way to address this serious issue when information is incomplete or unavailable in the first place. Patients have the right to know which nuclear medicine centers have issues in the proper administration of medical isotopes.

By adopting the recommendations included in the petition in Docket: NRC-2020-0141, we can begin to tackle this serious problem while continuing to make significant strides forward in the diagnosis and treatment of cancer patients. On behalf of the patients we serve, we thank you for considering our request.

Sincerely,

ACE, Advocates for Collaborative Education, California
Cancer in the Know, Pennsylvania
Cervivor, Maryland
Chicago Hispanic Health Coalition, Illinois
Día de la Mujer Latina, Texas
Inflammatory Breast Cancer Research Foundation, Indiana
ICAN, International Cancer Advocacy Network, Arizona
New Day Foundation, Michigan
Patients Rising, Virginia
Peer Plus, Illinois
Research Advocacy Network, Texas
Stupid Cancer, Inc., New York
The Pink Fund, Michigan
Tigerlily Foundation, Virginia
YSC, Young Survival Coalition, New York