



Information Quality Coordinator
U.S. Nuclear Regulatory Commission
TWFN-6B29

Washington, DC 20555

Delivered on August 8, 2022, via email to info.quality@nrc.gov

To Whom it May Concern:

I am following up on the Information Correction Request we delivered on June 2, 2022, regarding the NRC policy that exempts reporting of certain accidental patient exposures. This request, submitted in accordance with NRC's Information Quality Guidelines, sought to correct the longstanding falsehood that nuclear medicine extravasations are "virtually impossible to avoid."

NRC has passed the 45-day response window as outlined in the "Public Meetings & Involvement" section of the NRC website. We respectfully ask the NRC to notify the Young Survival Coalition and the Patients for Safer Nuclear Medicine Coalition on its final decision regarding the correction request.

As noted in the original correction request (attached), we ask NRC to immediately issue a notice of interpretation in the *Federal Register* that includes the following: 1) the statement that extravasations are "virtually impossible to avoid" is factually inaccurate; 2) as a result, the underlying rationale for exempting extravasations from reporting criteria is unjustified; and 3) the NRC should immediately modify 10 C.F.R. § 35.2 and 10 C.F.R. § 35.3045 to require reporting of extravasations resulting in a localized dose equivalent exceeding 0.5 Sv.

Taking these steps will help advance evidence-based policies that protect patients. Right now, patients are undergoing nuclear medicine treatments every single day without adequate NRC oversight. Because of the incorrect information in the *Federal Register*, patients are kept in the dark about their care, NRC doesn't have the data it needs to keep future patients safe, and providers have little incentive to lower their extravasation rates even though such extravasations are avoidable. Correcting this inaccurate information will eliminate a falsehood that has left patients vulnerable to unnecessary radiation exposure since 1980.

On behalf of the Young Survival Coalition, the thousands of patients represented by the Patients for Safer Nuclear Medicine Coalition, and the 620 petition signatories provided as part of the original correction request, we urge the NRC to grant the request and protect patients from unnecessary radiation exposure. Thank you for your consideration.

Sincerely,

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Young Survival Coalition on behalf of the Patients for Safer Nuclear Medicine Coalition