

# PUBLIC SUBMISSION

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Reporting Nuclear Medicine Injection Extravasations as Medical Events

**Comment On:** NRC-2022-0218-0004

Reporting Nuclear Medicine Injection Extravasations as Medical Events

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## General Comment

Extravasation of radiopharmaceuticals is an important QA issue but it should not be a medical event. It is incumbent on healthcare providers to perform these administrations appropriately and we do place extreme emphasis on this. These occurrences are best assessed and determined at the time of administration or via imaging the day of the procedure. Adding this as a medical event is unlikely to provide much benefit. Only theranostic or therapeutic administrations have any potential to cause tissue reactions or biological effects. Including all extravasations as medical events is not beneficial and extremely cumbersome. Only those that reach 50 rem may be worthwhile to report.