

# PUBLIC SUBMISSION

<b>As of:</b> 6/2/23, 2:19 PM
<b>Received:</b> May 26, 2023
<b>Status:</b> Pending Post
<b>Tracking No.</b> li4-u6uv-rint
<b>Comments Due:</b> July 18, 2023
<b>Submission Type:</b> Web

**Docket:** NRC-2022-0218  
Reporting Nuclear Medicine Injection Extravasations as Medical Events

**Comment On:** NRC-2022-0218-0004  
Reporting Nuclear Medicine Injection Extravasations as Medical Events

**Document:** NRC-2022-0218-DRAFT-0018  
Comment on FR Doc # 2023-08238

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## General Comment

I have worked as a certified Nuclear Medicine Technologist for 30 years and have also been a Radiation Safety Officer for over 20 of those years. I have never seen any bad outcomes with extravasation of Tc99m the most commonly used pharmaceutical in general nuclear medicine. The energy is low 140 KEV and half life is short 6hrs. This is also absorbed from the extravasation and excreted through the kidneys. Reporting extravasations on this isotope would be greatly cumbersome for both the facility and the reporting body due to the sheer volume of studies done with this isotope. I do however agree with therapeutic isotope extravasations being reported which would come under the written directive process since these can cause harm localized to the site of injection and most are Beta emmitters. I do howe