

From: [Heidi Adams](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] Public comment: Docket ID NRC-2022-0218
Date: Tuesday, June 27, 2023 1:03:54 PM

Dear NRC,

I'm writing to share my perspective on Docket ID NRC-2022-0218 both as a cancer survivor and as a supporter of the patient advocacy organization Patients for Safer Nuclear Medicine. By mandating patients to notify hospitals only when they have been harmed, it feels as though you are only partially addressing the issue at hand:

First, you are putting the onus for monitoring a medical procedure on patients and caregivers who are most likely unfamiliar with the procedure, not aware of what to look out for, and are highly likely to already be overwhelmed with care burdens. It's just one more scary responsibility added to their plates.

The other part that seems to be conveniently overlooked is the impact of extravasations on image quality and quantification. While the radiation effects on arm tissue are indeed important, all patients would and should be concerned about the implications of inaccurate imaging on their procedures and subsequent treatments. They depend on the accuracy of these images for treatment plans and, essentially, their lives--are we really willing to risk that?

Additionally, if a substantial amount of radioactivity remains in a patient's arm post-procedure, what implications does this hold for exposing others? Is it safe to return home, to embrace our loved ones without causing them harm?

Should we really bide our time until the injury manifests visibly? Should we wait for weeks, months, or even years, enduring lingering doubt about the accuracy of our images? Should we hesitate to hug our family and friends upon returning from imaging procedures, a routine that some patients must endure every three months for the rest of their lives?

Or should we not, instead, simply strive to monitor injections and improve their quality?

I implore you to consider the broader implications of your proposed rulemaking and to remember the very core of your mission: to protect public health and safety. I believe that can be better achieved by not merely responding to visible injuries but by preventing potential harm through better procedure quality and safety.

Sincerely,

Heidi Adams

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