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Reporting Nuclear Medicine Injection Extravasations as Medical Events

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General Comment

This proposed rule does not make much sense to me from the standpoint of a patient. It seems to suggest that a sick patient undergoing many medical procedures and treatments should identify for themselves if they were exposed to a potentially harmful level of radiation during a nuclear medicine procedure. Then they have to go back to the doctor who misadministered the injection in the first place and convince them that their injury or symptom was caused by the procedure they performed months or year prior? That will never happen.
Rather than requiring patients to be injured, why doesn't NRC just take proactive steps to improve injection quality in the first place, just like what is required in other areas? This is a fixable problem - in fact it has been fixed for other disciplines of medicine where drugs are injected intravenously. I don't understand why NRC and physicians act like it is such a huge imposition to be sure radiopharmaceuticals are injected properly into the vein. It's not too much to ask for an injection to be performed correctly, nor is it unreasonable to ask for transparency when it is not.
I urge NRC to go back to the drawing board on this. Just require reporting whenever a patient is irradiated above the current limit. It doesn't have to be this hard..