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Draft Regulatory Guide: Release of Patients Administered Radioactive Material

**Comment On:** NRC-2023-0086-0001

Draft Regulatory Guide: Release of Patients Administered Radioactive Material; Extension of Comment Period

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## General Comment

Thank you for the opportunity to comment on this draft regulatory guide regarding the immediate release of patients administered radioactive material. I will confine my comment specifically to the release of patients containing radioactive iodine-131 immediately following thyroid therapy which is what I am most experienced with and concerned about.

My specific concern is with the high potential for patients released with this nuclide to contaminate their home environment. I know from over thirty years of experience directly managing such individuals in an inpatient hospital setting that room contamination can be, and in most cases will be significantly elevated. It has been my experience that elimination of such contamination requires considerable effort and expertise, and is important from both a regulatory and a radiation safety perspective.

The draft regulatory guide does not address the issue of home contamination which in many cases might be expected to be considerable based upon my years of professional experience handling such individuals. The guide only addresses exposure to other individuals. This is a serious omission, as home contamination can pose a potentially significant radiation safety risk. In particular, I am concerned about the possibility of young children and infants in such households to inadvertently ingest radioactive iodine-131. Internalization of this thyroid seeking radionuclide could have serious health consequences especially in younger individual because of their longer life expectation.

Please consider modifying this draft proposal to require if not an outright prohibition of immediately releasing such patients to homes where children are present, to at least include a requirement to provide instructions on how to minimize home contamination and a caution addressing the problem of home contamination.