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ADD: Harriet
Karagiannis, Bridget
Curran, Brain Allen,
Mary Neely
Comment (44)
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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

Document: NRC-2023-0086-DRAFT-0046

Comment on FR Doc # 2023-08418

Submitter Information

Name: Lisa States**Address:**

Plymouth Meeting, PA, 19462

Email: states@chop.edu**Phone:** 12158689036

General Comment

Dear Stacy Schumann,

I would like to thank you for extending the time to provide comments regarding the changes in release of patients administered radioactive material. As a pediatric radiologist at an academic center that treats pediatric patients with neuroblastoma with I131 MIBG, I am concerned with your release criteria.

The changes proposed will have major effects on families and patients in several ways. As an example, young children undergoing I131 MIBG therapy will require a bladder catheter for patient safety and nursing safety. Sedation is typically required during insertion prior to therapy, during therapy and during the time period prior to release. With the new release criteria, patients may require a bladder catheter longer, increasing the risk of infection, require sedation longer which can have neurocognitive effects and may require observation in the ICU. These patients are also at risk for having delirium during withdrawal of sedation. This increase in the number of sedation days will also impact the family financially. Young children and some older children require sedation due to the inability to separate from the parents. This is an incredibly stressful situation for all involved, including staff. This is just one example of the negative impact of the proposed changes.

Please feel free to reach out to me for a discussion.

Sincerely,

Lisa States

Director of Oncologic Imaging, Children's Hospital of Philadelphia

Professor of Clinical Radiology, UPENN