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PUBLIC SUBMISSION

Docket: NRC-2023-0086

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-0049

Comment on FR Doc # 2023-08418

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General Comment

Docket ID NRC-2023-0086

Comments on Draft Regulatory Guide: Release of Patients Administered Radioactive Material

Stanford Health Care has seen steady growth in therapies over the years. With the advent of theragnostics, treatments have increased exponentially (as shown in the chart below). We anticipate quadrupling Pluvicto patients in the next 2 to 3 years and even more significant growth with alpha PSMA, bombesin, FAPI, and other theragnostics approval.

We have safely treated these patients using the guidelines in Regulatory Guide 8.39. Most of the patients are treated in our Nuclear Medicine Department as outpatients. The proposed changes to the criteria for outpatient release would seriously jeopardize our capacity to serve the patient population and potentially restrict them from critical life-saving care. We strongly urge the NRC to reject the new Draft Guidance proposal and maintain the ability to implement a 0.25 occupancy factor for outpatient release, thus keeping the standard of care for thousands of Americans.

Comments presented by:

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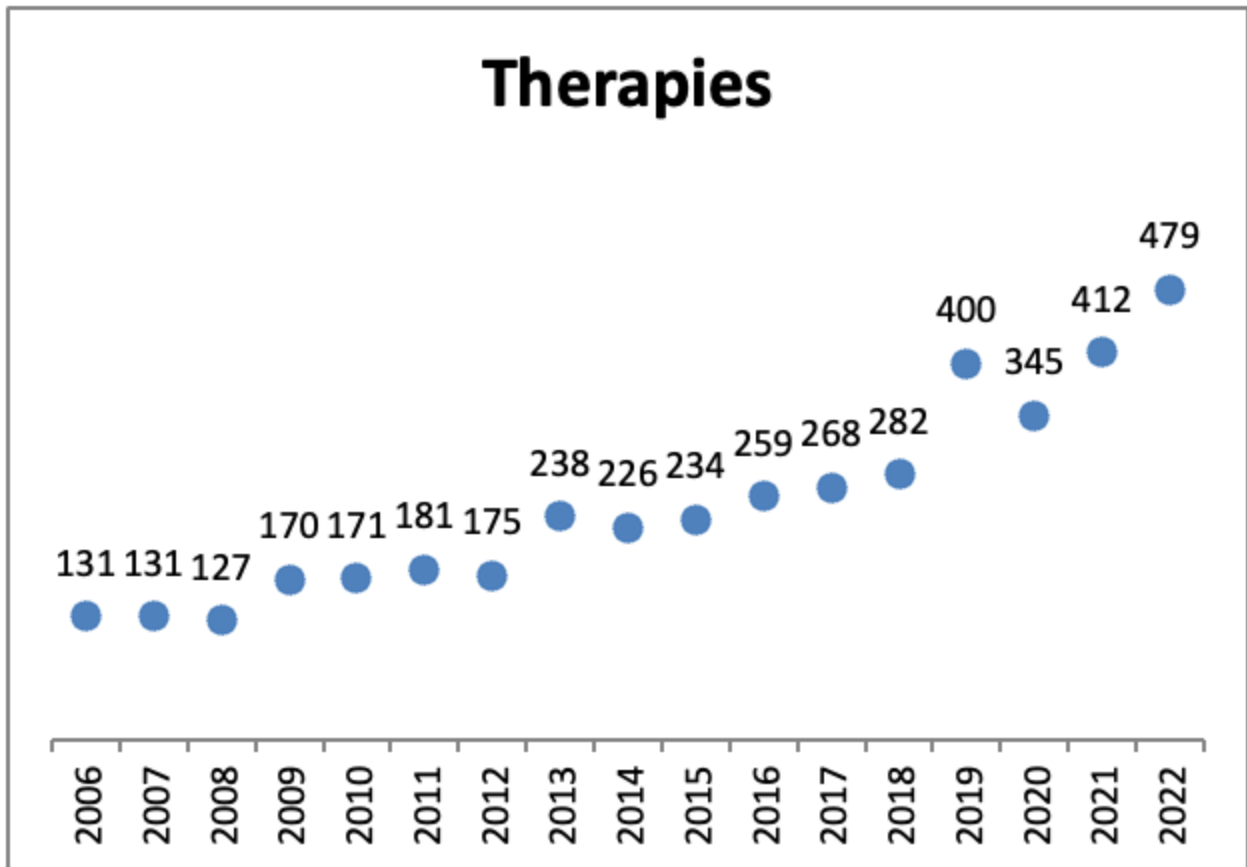
Attachments

NRC comments

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