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PETITION RULE PRM 35-15
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Secretary, U.S. Nuclear Regulatory Commission
Washington D.C. 20555
Attention: Rulemakings and Adjudications Staff

OFFICE
OF
ADJUDICATION

Re: Comments on Petition For Rulemaking (Docket No. PRM-35-15)

The petition for rulemaking to prohibit the hand-held administration of radiopharmaceuticals by injection and to require the use of the Angel Shield should be rejected in its entirety based on the following:

1. Prohibiting hand held injection of radiopharmaceuticals will adversely affect the ability to perform certain procedures which require delicate administration techniques such as lymphatic mapping and sentinel node studies.
2. The petitioner has not demonstrated that hand exposures to nuclear medicine personnel, which are within occupational limits, are excessive and present a significant health risk.
3. A licensee should be able to decide what procedures, equipment and facilities are necessary in the practice of its ALARA program.
4. The petitioner has not performed a cost-benefit analysis demonstrating optimization of radiation protection with the expense of purchasing the Angel Shield.
5. The motive for this proposed rulemaking appears to be self-serving on the part of the petitioner in that it requires the purchase of a sole market device.

Michael Sheetz, C.H.P.
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