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February 10, 2012

Christian Einberg
Chief, Radioactive Materials Safety Branch
Office of Federal and State Materials and
Environmental Management Programs
United States Nuclear Regulatory Commission
Mail Stop: T-8E24
Washington, DC 20555-0001

Dear Mr. Einberg,

It is our understanding the Radium-223 chloride is in development and will hopefully be approved for routine clinical use soon. We recommend that it be licensed under 10 CFR 35.300.

Diplomates of the ABNM have the core knowledge necessary to safely administer therapeutic doses of all unsealed radioactive sources (licensed under 35.300) regardless of their mode of decay. Adding additional training requirements for ABNM diplomates for therapeutic radiopharmaceuticals based on their mode of decay would adversely affect patient care since it would limit patient access to new therapies.

Sincerely,

Henry D. Royal, MD
Executive Director