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Training and Experience Requirements for Different Categories of Radiopharmaceuticals

Comment On: NRC-2018-0230-0001

Training and Experience Requirements for Different Categories of Radiopharmaceuticals

Document: NRC-2018-0230-DRAFT-0020

Comment on FR Doc # 2018-23521

Submitter Information

Name: Vicki LaRue

General Comment

See attached file(s)

Attachments

dr byrd letter

Dear NRC,

I am writing to propose the scope of licensure of individuals attaining the status of authorized user be extended to include the Nuclear Medicine Advanced Associate (NMAA). I write not as an academic but as a working Nuclear Medicine Physician with extensive experience of a hospital-based NMAA practitioner.

I am a full time Nuclear Medicine Physician with a practice involving general nuclear medicine, extensive nuclear cardiology and stress testing, PET imaging, and radionuclide therapy. I employ an individual who is an early graduate and who may very well be the first NMAA practitioner credentialed at a hospital. This arrangement with a very well qualified nuclear medicine extender clearly improves productivity and quality. One half of the patients at our tertiary care medical center travel here from more than 50 miles away. It is certainly to their benefit to be able to be cared for immediately via the addition of our nuclear medicine physician extender. In the 7 years of her employ my referring colleagues have come to rely on her judgement and skill much as they do my own.

The training and extensive clinical clerkships required for NMAA status results in an individual who is very well qualified to assist in the practice of nuclear medicine with appropriate supervision. This is a similar setting as a Nurse Practitioner working with a sponsor. My experience assures me that Authorized User status for such a person should be considered.

Sincerely

Bill Byrd, MD.