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Training and Experience Requirements for Different Categories of Radiopharmaceuticals

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Training and Experience Requirements for Different Categories of Radiopharmaceuticals

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Submitter Information

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General Comment

Docket ID NRC-2018-0230

I am a physician dual boarded in Radiology (ABR) and Nuclear Medicine (ABNM). I did residencies in both specialties. I am an Authorized User and the Medical Director of Nuclear Medicine at the hospital where I practice.

I strongly oppose allowing individuals without ABNM accreditation perform therapies. Nuclear Medicine therapy administration is an advanced skill requiring years of training, including in radiochemistry, radiophysics, endocrinology, and nuclear medicine, in order to be performed safely. The extensive track record of safe radiopharmaceutical administration at any general nuc med clinic undoubtedly is credited toward this experience. Administration of a therapy is not something that can be performed in a vacuum by any physician. The safety of the patients, public at large, other healthcare workers, and nuclear medicine technologists depends on having an experienced authorized user at the helm. It is ludicrous to think that someone could undergo a brief training course and be competent in all of the aforementioned areas. If there is a shortage of available trained authorized users, then the government needs to focus on funding for more nuclear medicine physicians in training.

Thank you.