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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-0056

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Submitter Information

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General Comment

Dear NRC,

Thank you for inviting comment on this important topic. I am a Radiologist with Board Certification in both Radiology and Nuclear Medicine.

I have practiced in both rural and urban settings. In rural settings, I was acquainted with co-workers that held AU status,

but did not have specific Nuc Med training. Those without the additional training lacked confidence in designing, monitoring,

and adjusting protocols as required for individual patient needs. Services were hence kept at a basic level.

1. The training requirements for Nuclear Medicine Board Certification include all the necessary components for confident administration

of radiation therapy eg. I 131 treatment.

2. Radiation Oncologists may also the training necessary for certain radiopharmaceuticals.

3. Most Radiologists without additional training are unlikely to have this knowledge.

4. Obtaining additional training in Nuclear Medicine in the U.S. is not difficult. Residency posts are often available, and a Radiologist

only requires one additional year of training, equivalent to a Fellowship.

5. Current training standards in Nuclear Medicine Residencies are adequate for AU status.

6. There may be a shortage of AUs in rural areas. However with Nuc Med training readily available to Radiologists, this gap should be fillable.

Those without training equivalent to NM Residency may lack the necessary knowledge to safely and confidently administer Radiotherapeutic agents.