

# PUBLIC SUBMISSION

SUNSI Review Complete  
Template = ADM-013  
E-RIDS=ADM-03  
ADD=Sarah Lopas

COMMENT (73)  
PUBLICATION DATE:  
10/29/2018  
CITATION: 83 FR 54380

<b>As of:</b> 1/29/19 9:29 AM <b>Received:</b> January 28, 2019 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k3-97xs-igau <b>Comments Due:</b> January 29, 2019 <b>Submission Type:</b> Web
--

**Docket:** NRC-2018-0230

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-0079

Comment on FR Doc # 2018-23521

## Submitter Information

**Name:** Samuel Mehr

## General Comment

Docket ID NRC20180230

I am a physician certified by the American Board of Nuclear Medicine with more than thirty years experience in both clinical and academic Nuclear Medicine. My comments are my own and may not reflect the views of any organization with whom I am affiliated.

1. I am opposed to any reduction in the Training and Experience Requirements for Different Categories of Radiopharmaceuticals.

New radiopharmaceuticals with new particle-emitting radioisotopes are being introduced into clinical medicine. Reducing training and experience requirements in an evolving discipline places patients, providers and the public at risk.

2. If a shortage of Authorized Users exists, placing the public at risk by allowing inadequately trained providers to administer radiopharmaceuticals is not an appropriate solution.

3. The number of Authorized Users may be increased by authorizing Nuclear Medicine Advanced Associates (NMAA) to administer radiopharmaceuticals. Nuclear Medicine Advanced Associates are certified mid-level providers; equivalent to a Physician Assistant (PA-C). Through training, education and experience these certified providers meet the current Training and Experience requirements. Under the supervision of an Authorized User (physician) NMAA's are uniquely qualified to provide the technical, radiation safety, and patient-care skills necessary to provide these services.

By combining the services of a nuclear medicine technologist and healthcare provider, the NMAA is able to deliver services at the lowest possible cost without compromising safety.