

# PUBLIC SUBMISSION

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

COMMENT (80)  
PUBLICATION DATE:  
10/29/2018  
CITATION: 83 FR 54380

<b>As of:</b> 1/29/19 10:05 AM <b>Received:</b> January 28, 2019 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k3-97xv-a4yr <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-0086

Comment on FR Doc # 2018-23521

## Submitter Information

**Name:** Anonymous Anonymous

## General Comment

Radiotherapy is a totally different field as other treatment, which requires understanding and experience in radiophysics, radiobiology, radiosafety. It is unlikely for a non radiology/Nuclear Medicine trained physician to become competent with a limited hours of course. The current 700 hour requirement is already insufficient in my opinion. If the hour is further reduced, the patient, the public and even the treating physician will be in jeopardy. There is no shortage of current AU to provide radiotherapy such as I-131, Xofigo and Lutathera. If there is a possibility of difficult access to the treatment for patients in rural areas or under service areas, the reasonable way is to arrange these patients to access qualified facility, rather than send AU with limited training to those areas.