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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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General Comment

The NRC must exercise caution when considering the proposed Tailored Training and Experience Requirements, and should not reduce the present training requirements for the handling of radiopharmaceuticals.

Currently, the vast majority of radiopharmaceuticals are administered for diagnostic purposes. In these cases, administered radioactivity and consequent risks to patients are relatively low. However, as more therapeutic radiopharmaceuticals are developed and utilized in clinical practice, the risk of harm to patients can be substantial. Unlike other drugs, therapeutic radiopharmaceuticals can also cause harm to the patients family members and care providers. Given the increasing utilization of therapeutic radiopharmaceuticals, it could be argued that NRC training requirements in this regard should be intensified rather than reduced.

ABNM, AOBR, and ABR-certified Authorized Users in concert with CNMT and NMAA technologists are uniquely experienced with the handling of radioactive materials and are dedicated to the appropriate and safe administration of diagnostic and therapeutic radiopharmaceuticals. Treating oncology patients is by definition a multidisciplinary endeavor, and the treatment team should include an Authorized User who is fully trained under current

NRC requirements. This approach provides the highest quality care and safety for our patients and their families, and most appropriately fulfills the NRCs primary responsibility to protect public health and safety.