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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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Name: Anonymous Anonymous

General Comment

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To Whom It May Concern

With Reference to: Docket ID NRC-2018-0230

I am an American Board Certified Nuclear Medicine Physician and have been practicing Nuclear Medicine, including being an Authorized User (AU) for the past 35 plus years. It is very troubling to me that the NRC is considering making changes and shortening the training and education requirements to achieve AU status more quickly by making the requirements less stringent especially since the therapies are more complex and are associated with the potential for serious side effects to the patients and increased radiation safety risks for staff and other medical personnel. Such short sighted changes will have very sad repercussions for our patients, support staff and in the long run will hurt our field.

I do not know of any shortage of Authorized Users that will warrant such drastic measures. It is a well known fact that compensation for Nuclear Medicine physicians is much less than in other fields in Radiology. If this can be addressed and improved, there will definitely be more than enough physicians entering and staying in our field. I also suspect the increased remuneration associated with these therapies is a reason for the sudden interest in radio nuclide therapies.

In fact the NRC should make the requirements more more stringent so that the radio nuclide

therapies will only be administered by fully trained qualified nuclear medicine physicians who have a thorough knowledge of the patients disease, radiation safety, radio biology, physics, instrumentation, diagnosis and management of adverse effects from the therapy, radiation spills, dose infiltration etc. The nuclear physician needs to be supported by a well qualified and trained team of vital support personnel namely, the nuclear pharmacist, radiation physicist, nurse and technologists who all work together as a team for the good of the patient.

Four months of training for a physician with no prior experience dealing with unsealed, parenteral or other types of radionuclide therapies is inadequate and is a recipe for disaster. Many of these patients have already received the full complement of available chemo therapies, radiation and other treatments and are at an increased risk of bone marrow suppression. Loosening restrictions on becoming an AU to administer therapies can lead to inappropriate, questionable or excessive use of such therapies leading to further government controls and mandates like we have experienced with myocardial perfusion imaging.

These are relatively new and complex therapies with potential for serious side effects and we should not be in a hurry to make them available to just any physician who feels they are ready and fully trained to administer unsealed radionuclides after just a few months of minimum training. It is best that these therapies are done in academic centers or large medical centers that are equipped with the full complement of support staff and a well trained AU so we treat the patient in the best way and manage complications and side effects as needed. The knowledge and experienced gained from these treatments can be shared with the at large nuclear community.

Expertise comes with solid training and experience. Considering the many different radio nuclides available to treat the different disease conditions, each with their own particular characteristics and requirements, it is definitely not possible to master all these different facets in the space of four short months. In my opinion I feel that a Nuclear Medicine AU is the one best qualified to do these therapies based on their training and experience with the day to day dealing in all types of radio nuclides and such treatments should be done in a good medical facility with a team of experienced support medical personnel and all working together ensures the patient gets the best possible treatment given by qualified and trained people.

Thank you for the opportunity to share my comments.

Anonymous