

## CHAIRMAN Resource

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**From:** Carol Marcus <[csmarcus@ucla.edu](mailto:csmarcus@ucla.edu)>  
**Sent:** Sunday, June 09, 2019 11:24 PM  
**To:** CMRBARAN Resource; CHAIRMAN Resource; CMRCaputo Resource; CMRWright Resource  
**Subject:** [External\_Sender] Fwd: NRC Draft RG 8.39

Dear Commissioners:

Please monitor this meeting, or have intelligent staff do so, because NRC fraud is disgusting.

Best, Carol S. Marcus, Ph.D., M.D.

----- Forwarded Message -----

**Subject:** NRC Draft RG 8.39

**Date:** Sun, 9 Jun 2019 18:22:26 -0700

**From:** Carol Marcus <[csmarcus@ucla.edu](mailto:csmarcus@ucla.edu)>

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**CC:** siegel jeffry <[nukephysics@comcast.net](mailto:nukephysics@comcast.net)>

June 9, 2019

Dear Chris, Mike, Pat, and Jeff:

After receiving a copy of the ACMUI Subcommittee Report on Nursing Mother Guidelines for the Medical Administration of Radioactive Materials, I checked to see whether, as stated in a note under Table 3 of NRC's draft RG 8.39, that the nursing interruption values in Table 3, column 3 of NRC's draft actually came from the ACMUI subcommittee report, as stated. **Nine of them didn't.** I don't know where they came from. I checked ICRP #106 p.164, and they didn't come from there. I think that Donna-Beth Howe just made them up. Pat's calculations for Tc-99m radiopharmaceuticals led him to recommend a 24 hr nursing interruption, and that was picked up by NRC. But many of the other values are weird. The worst is I-131-OIH. Pat suggests a 4 hr interruption. (ICRP # 106 suggests a 12 hr interruption.) But NRC claims complete cessation of breastfeeding. For TI-201 Cl, Pat suggests a 4.3 day interruption. (ICRP # 106 suggests a 2 day interruption.) But NRC lists a 14 day interruption. NRC is obviously lying about using Pat's calculations. I realize that the meeting is tomorrow, which doesn't give you or the ACMUI members much time, but please let me address the ACMUI on this issue. Claiming that their values were from the ACMUI Sub-Committee Report is a bold-faced lie.

Best, Carol