



DEPARTMENT OF VETERANS AFFAIRS

**Veterans Health Administration
National Health Physics Program**

**2200 Fort Roots Drive
North Little Rock, AR 72114**

**SUNSI Review Complete
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ADD: Jazel Parks, Harriet
Karagiannis**

August 15, 2019

Office of Administration, Mail Stop: TWFN-7A06
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**COMMENT (5)
PUBLICATION DATE: 7/26/2019
CITATION 84 FR 36127**

ATTN: Program Management, Announcements and Editing Staff
Docket ID NRC-2019-0154

Dear Sir or Madam,

We are writing to comment on Draft Regulatory Guide (DG), DG-8057, "Release of Patients Administered Radioactive Material", pursuant to a notice published in the Federal Register on July 26, 2019.

Tables 1, 2, and A-1 do not include the radionuclides F-18, Ga-68, Lu-177, and Ra-223. F-18 and Ga-68 are used frequently in PET imaging and Lu-177 and Ra-223 are used in radiopharmaceutical therapies. Table 3 of the document includes these radionuclides; we suggest that they be included in all the tables.

For some radiopharmaceuticals, there are typically multiple administrations to a patient in a year. The draft regulatory guide does not discuss this nor take this into account regarding the annual doses to members of the public. For example, Lu-177 dotatate is administered to patients up to four times in a year, which may suggest a release value for this radiopharmaceutical of 0.125 Sv per administration. We suggest this issue be discussed.

Thank you for the opportunity to comment on the draft regulatory guide. Please contact us, at 501-257-1571, if you have questions about this letter.

Sincerely,

Edwin M.

Leidholdt 398105

Digitally signed by Edwin M.
Leidholdt 398105
Date: 2019.08.15 16:33:47 -07'00'

Edwin M. Leidholdt, Jr., Ph.D., FACR
Director, VHA National Health Physics Program