

From: [Angie Morgan Hill \(ADH\)](#)
To: [RulemakingComments_Resource](#)
Cc: [Angie Morgan Hill \(ADH\)](#)
Subject: [External_Sender] Submittal by Arkansas RE: STC-20-066 (Docket ID: NRC-2020-0141 Comments - Petition for Rulemaking That Would Require Reporting of Certain Nuclear Medicine Injection Extravasations as Medical Events
Date: Monday, November 30, 2020 1:56:02 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image007.png](#)
[ARKANSAS COMMENTS TO NRC RE STC 20 066 NRC 2020 0141 DATED NOVEMBER 30 2020 BY ANGIE D MORGAN HILL.pdf](#)

November 30, 2020

Good afternoon U.S. Nuclear Regulatory Commission's Rulemaking and Adjudications Staff,

Enclosed are the Department's comments regarding the "Petition for Rulemaking That Would Require Reporting of Certain Nuclear Medicine Injection Extravasations as Medical Events" (STC-20-066; Docket ID: NRC-2020-0141).

The Department appreciates the opportunity to provide comments on these important issues.

If you have any questions, please feel free to contact me.

Kindest Regards,

Angie D. Morgan Hill

Angie D. Morgan Hill, MA HRMG, MA MGMT AND LDRSHP, BS, CNMT, ARRT (N)
Health Physicist, Radioactive Materials Program and Industrial Accelerators
Arkansas Department of Health
Radiation Control Section
4815 West Markham, Slot 30
Little Rock, Arkansas 72205-3867
Business Telephone: 501- 661-2173
Fax: 501-661-2849
E-Mail: angie.morgan.hill@arkansas.gov





CONFIDENTIALITY NOTICE:

The information contained in this e-mail message and any attachment is the property of the State of Arkansas and may be protected by state and federal laws governing disclosure of private information. It may contain information that is privileged, confidential, or otherwise protected from disclosure. It is intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that reading, copying or distributing this e-mail or the information herein by anyone other than the intended recipient is STRICTLY PROHIBITED. The sender has not waived any applicable privilege by sending the accompanying transmission. If you have received this transmission in error, please notify the sender by reply e-mail immediately, and delete this message and attachments from your computer.



Arkansas Department of Health

4815 West Markham Street • Little Rock, Arkansas 72205-3867 • Telephone (501) 661-2000
Governor Asa Hutchinson
José R. Romero, MD, Secretary of Health

November 30, 2020

Sarah Lopas and Pamela Noto
Division of Material Safety, State, Tribal, and Rulemaking Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852

Secretary
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Delivered via FED-EX and E-Mail

Dear Ms. Lopas, Ms. Noto, and Rulemaking/Adjudications Staff:

The Arkansas Department of Health, Radiation Control Section, Radioactive Materials Program, has reviewed the U.S. Nuclear Regulatory Commission's (U.S. NRC) letter and supplemental information addressed to "ALL AGREEMENT STATES" titled "NOTICE OF REQUEST FOR COMMENT: PETITION FOR RULEMAKING THAT WOULD REQUIRE REPORTING OF CERTAIN NUCLEAR MEDICINE INJECTION EXTRAVASATIONS AS MEDICAL EVENTS" (STC-20-066; Docket ID: NRC-2020-0141), dated September 22, 2020.

The Department appreciates the opportunity to comment on these important matters regarding radiation, patient, public, and financial health and safety.

The Department strongly recommends that an infiltrated and/or extravasated radiopharmaceutical dose that does not meet the current rules and regulations as defined in 10 CFR 35.3045 shall not be reported to the State and/or Federal Regulatory Agency.

The Department strongly recommends that an infiltrated and/or extravasated radiopharmaceutical dose that does meet the current rules and regulations as defined in 10 CFR 35.3045 shall be reported to the State and/or Federal Regulatory Agency.

The Department recommends that State and Federal Regulatory Agencies perform inspections on patient infiltrated and/or extravasated radiopharmaceutical doses to determine whether the current rules and regulations, as defined in 10 CFR 35.3045, for a Medical Event have occurred.

The Department strongly recommends that no changes take place in rulemaking regarding Medical Event criteria. The Department believes that appropriate rules and regulations are already in place. The Department recommends that any radiopharmaceutical and/or Radioactive Material source (also known as sealed source) implanted and/or infused and/or injected into a patient's body should qualify for inspection

by the State and/or Federal Regulatory Agency in order to determine whether the radiation dose meets the criteria for a Medical Event.

The Department strongly recommends that the U.S. NRC and Agreement States prepare and issue medical guidance to address definitions, current rules/regulations, calculations, and dose measurements in reference to a Medical Event.

The Department appreciates the opportunity to provide comments on these important issues. If I may be of further assistance, please contact me or the Radioactive Materials Program Staff at (501) 661-2173. Please address correspondence to the above address at Slot # 30, E-Mail at angie.morgan.hill@arkansas.gov, or via fax to (501) 661-2849.

Sincerely,



Angie D. Morgan Hill, MA HRMG, MA MGMT & LDRSHP, BS, CNMT, ARRT (N)
Health Physicist, Radiation Control Section, Radioactive Materials Program

cc: Ms. Lopas' E-Mail: Sarah.Lopas@nrc.gov
Ms. Noto's E-Mail: Pamela.Noto@nrc.gov
U.S. NRC's E-Mail: Rulemaking.Comments@nrc.gov
Terry Derstine, Chair, Organization of Agreement States
Bernard Bevill, Section Chief, Radiation Control, Arkansas Department of Health
Jared Thompson, Supervisor, Radioactive Materials Program, Arkansas Department of Health

ADMH: ADMH