



October 4, 2021

ATTENTION: John Cardarelli II, PhD, CHP, CIH, PE
President, Health Physics Society

Dr. Cardarelli,

I am writing to you on behalf of Patients for Safer Nuclear Medicine, a national coalition of 17 patient advocacy organizations, across several therapeutic areas, representing hundreds of thousands of patients in the US. The coalition is also proud to have corporate partners like UPPI, a radiopharmacy organization and its network of 80 nuclear pharmacies. Together, we are dedicated to the development of federal policies that support safe, transparent, and effective nuclear medicine care on behalf of patients throughout the U.S.

Your website states that the mission of the Health Physics Society (HPS) includes promoting “excellence in the science and practice of radiation safety.” We agree with and support you in this laudable goal.

With that in mind, we are contacting you to raise concern about public comments submitted by your predecessor to the Nuclear Regulatory Commission in 2020 regarding petition PRM-35-22. We believe the statement from HPS does not reflect “excellence in the science and practice of radiation safety.” While our review of the HPS public comment now on record has identified numerous questionable statements, we highlight two below as examples:

- HPS does not acknowledge that diagnostic extravasations can result in high, potentially harmful doses to patient tissue.
- HPS states that there is no evidence that radiopharmaceutical extravasations carry any consequences for the patient.

We are calling on you to embrace the science and either retract or amend the statement to the NRC.

Petition PRM-35-22 notes that extravasations can exceed the threshold that triggers medical event criteria but are not reported because of an exemption created by outdated, unjustifiable 41-year-old NRC policy. Even the Advisory Committee on the Medical Uses of Isotopes (ACMUI) which has advised for 40 years to retain the reporting exemption recently acknowledged that diagnostic extravasations can exceed NRC medical event reporting criterion and can harm patients.

We support the petition before the NRC and, specifically, the call to require reporting of extravasations that exceed NRC’s existing dose limits. In addition to the very real harm to the patient from high doses of ionizing radiation, we also know extravasation can negatively impact



the resulting diagnostic images, potentially leading to misdiagnosis that can affect the patient's treatment plan.

The Patients for Safer Nuclear Medicine Coalition speaks for those patients that are facing a life-changing diagnosis and course of treatment. In good conscience, vital information regarding extravasation should not be withheld from these patients. They have a right to know, as do their physicians.

We contend that requiring the reporting of extravasations is medically necessary and will encourage providers to take the necessary steps to ensure nuclear medicine is as safe and effective as possible.

To preserve the integrity of HPS and reflect the organization's stated pro-science commitment, we hope that you will seriously consider the impact that the 2020 statement has on the reputation of HPS, and that you will correct the record with the NRC.

We thank you for your attention to this matter and look forward to your response.

Sincerely,
Patients for Safer Nuclear Medicine Coalition

Patient Advocacy Members:

ACE, Advocates for Collaborative Education
Cancer in the Know
Cancer is an asshole
Cervivor
Chicago Hispanic Health Coalition
Día de la Mujer Latina
Inflammatory Breast Cancer Research
Foundation
ICAN, International Cancer Advocacy
Network
New Day Foundation
Patients Rising
Peer Plus
Research Advocacy Network
Stupid Cancer, Inc.
The Pink Fund
Tigerlily Foundation
Touch, The Black Breast Cancer Alliance
YSC, Young Survival Coalition

Corporate Members:

UPPI