



August 8, 2024

Dear Dr. Brackett,

We are Patients for Safer Nuclear Medicine (PSNM), a growing coalition of 30 non-profit patient advocacy organizations representing tens of thousands of patients. We are committed to increasing transparency and safety for nuclear medicine patients. We are watching the radiopharmaceutical extravasation reporting issue closely since we rely on nuclear medicine procedures to save or improve our lives.

We became aware of a letter from six organizations, including the Health Physics Society (HPS), that was sent on May 31 to members of Congress. Experts in nuclear medicine, radiology, patient safety, vascular access, and radiation oncology copied us on their response to the letter. These experts demonstrated the May 31 letter provided information to members of Congress about extravasations that cannot be scientifically supported. We also became aware of a case report published in the *Pharmacology Research & Perspectives* journal titled "Detection and Dosimetry of Radiopharmaceutical Extravasation" (DOI: [10.1002/prp2.1232](https://doi.org/10.1002/prp2.1232)), which supports the experts' position.

The case report highlighted the constant vigilance that is needed to ensure that all radiopharmaceuticals are administered safely. It showed the need to monitor for and immediately mitigate large extravasations. It showed how a large extravasation of the radioisotope ^{99m}Tc can result in a very high absorbed dose to a patient's tissue, a dose that physically harmed the patient and caused them to have to repeat the imaging procedure. This report presents unbiased, factual, information from unconflicted clinicians. The report should not be overlooked or disregarded.

The coalition is aware that medical societies in the United States are lobbying to avoid having to report large extravasations to the NRC and the patient, even though such an accidental exposure meets all the criteria the NRC has established for accidental exposures. We are confused why the HPS, an organization dedicated to radiation protection and the advancement of safety practices, would have signed a letter that is clearly not aligned with radiation protection or advancing safety practices.

The PSNM coalition is advocating for enhanced monitoring and accurate reporting of extravasations based on an **objective** dose threshold, that the NRC uses as a criterion for every other safety event. Reporting helps the NRC identify centers that may be having trouble properly handling medical isotopes. It also ensures that patients who receive an accidental, large, absorbed dose of radiation to their healthy tissue will be told when this happens. The coalition will not waiver on the need for transparency in patient care. It is critical to our safety and treatment plans.

We are asking you, as the president of HPS, to investigate the HPS involvement in the May 31 letter. We see that you have a background in internal dosimetry. We see that you want to improve how the HPS operates. When you use your expertise to investigate this issue, you will find that science cannot support the HPS position. As patients it is clear to us that medical societies are clearly on the wrong side of this patient safety and care issue and your leadership is needed to right this wrong.

We wrote to your predecessor, Dr. Cardarelli, about a misstep HPS made on the extravasation reporting issue under Dr. Goldin's leadership. We would like to discuss with you how HPS has taken yet another misstep by signing the May 31 letter. To regain trust of patients, we ask the society to correct their position and be a leader in advocating for improved practices in the administration of radiopharmaceuticals.

We want to work with HPS to do the right thing and make nuclear medicine as safe and as transparent as possible. We look forward to your prompt response. Time is critical, as over 2,000 patients in the US receive radiation doses similar to those in the case report daily. Knowing that these will need to be reported in the future will drive providers to address the root causes that lead to so many radiopharmaceutical extravasations.

Sincerely,

Mary Ajango, Young Survival Coalition
Member of the Patients for Safer Nuclear Medicine Coalition