May 31, 2023

Attn: Program Management, Announcements and Editing Staff
Office of Administration
Mail Stop: TWFN–7–A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001

Re: Docket ID NRC–2023–0086; Draft Regulatory Guide: Release of Patients Administered Radioactive Material; Request for 60-Day Comment Period Extension

The American College of Radiology (ACR),[1] American Association of Physicists in Medicine (AAPM),[2] American Society for Radiation Oncology (ASTRO),[3] and Society of Nuclear Medicine and Molecular Imaging (SNMMI),[4] appreciate the efforts of the Nuclear Regulatory Commission (NRC) to collect public feedback on the draft regulatory guide, DG–8061, *Release of Patients Administered Radioactive Material*, the proposed second revision of Regulatory Guide 8.39 (Docket ID NRC–2023–0086). We acknowledge the planned sixty-day comment period is longer than required by NRC policy; however, we respectfully request an additional sixty-day extension (i.e., through mid-August 2023) to facilitate robust review of all proposed modifications in the extensive DG.

Key proposals in DG–8061 related to calculations are technical and potentially consequential for patient release determinations pursuant to 10 CFR 35.75. All stakeholders would benefit from additional time to consider any practical effects. Moreover, the NRC's comment period corresponding with DG–8061 is currently overlapped by a comment period ending July 18 for the extravasation request for information (Docket ID NRC–2022–0218). The DG and extravasation topics would each benefit from dedicated, substantive assessments by §35.200/35.300 licensees and experts.

We appreciate the NRC's time and consideration of a sixty-day extension. If you have questions about this request, please contact Michael Peters, ACR Senior Government Affairs Director, at mpeters@acr.org.

Sincerely,

Jacqueline A. Bello, MD, FACR
Chair, Board of Chancellors
ACR

Ehsan Samei, PhD, FAAPM
President, AAPM

Laura Thevenot, CEO
ASTRO

Munir Ghesani, MD, FACNM, FACR
President, SNMMI

[1] ACR is a professional association representing more than 41,000 diagnostic radiologists, interventional radiologists, radiation oncologists, nuclear medicine physicians and medical physicists.

[2] AAPM is the premier organization in medical physics, a broadly based scientific and professional discipline encompassing physics principles and applications in biology and medicine whose mission is to advance the science, education and professional practice of medical physics. Medical physicists contribute to the effectiveness of radiological imaging procedures by assuring radiation safety and helping to develop improved imaging techniques (e.g., mammography CT, MR, ultrasound). They contribute to development of therapeutic techniques (e.g., prostate implants, stereotactic radiosurgery), collaborate with radiation oncologists to design treatment plans, and monitor equipment and procedures to ensure that cancer patients receive the prescribed dose of radiation to the correct location. Medical physicists are responsible for ensuring that imaging and treatment facilities meet the rules and regulations of the NRC and various State regulatory agencies. AAPM represents over 9,000 medical physicists.

[3] ASTRO is the largest radiation oncology society in the world, with more than 10,000 members who specialize in treating patients with radiation therapies. As the leading organization in radiation oncology, biology and physics, the Society is dedicated to improving patient care through education, clinical practice, advancement of science and advocacy. ASTRO's highest priority has always been ensuring patients receive the safest, most effective treatments.

[4] SNMMI is the leading global organization transforming the science and practice of diagnostic and therapeutic nuclear medicine. The society represents more than 14,000 nuclear medicine physicians, technologists, and scientists.