



Maryann O. N. Ayoade  
Medical / Health Physicist  
Medical Radiation Safety Team  
United States Nuclear Regulatory Commission  
Washington, DC 20555

June 11, 2020

Dear Ms. Ayoade,

Re: COVID-19 PHE Regulatory Relief request for 10 CFR Part 35.290 (c)(1)(ii)(G)

The American Society of Nuclear Cardiology, the Society of Nuclear Medicine and Molecular Imaging, the American Society of Radiation Oncology and the American College of Radiology request that the Nuclear Regulatory Commission (NRC) consider 10 CFR Part 35.290 (c)(1)(ii)(G), *Training for imaging and localization studies* as a potential area for regulatory relief during the COVID-19 Public Health Emergency (PHE). The regulation reads:

“Work experience must involve: Eluting generator systems appropriate for preparation of radioactive drugs for imaging and localization studies, measuring and testing the eluate for radionuclidic purity, and processing the eluate with reagent kits to prepare labeled radioactive drugs”. We believe that this particular requirement can be satisfied using virtual technology, and as such request that the NRC add this as an already vetted area for regulatory relief when requested by licensees.

Most of the commercial radiopharmacies who supply portions of this training are closed to visiting trainees because of the PHE, and may not reopen for the foreseeable future. We believe this experience requirement can be satisfied virtually, via demonstrative educational webinars during the duration of the public health emergency.

The undersigned organizations appreciate the NRC’s commitment to expeditious review of regulatory relief requests during the COVID-19 pandemic. Please contact Georgia Lawrence, Director, Regulatory Affairs at [glawrence@asnc.org](mailto:glawrence@asnc.org) should you have any further questions.

Sincerely,

Sharmila Dorbala, MD, MPH  
President  
American Society of Nuclear Cardiology



A handwritten signature in black ink, appearing to read "Vasken Dilsizian".

Vasken Dilsizian, MD  
President  
Society of Nuclear Medicine and Molecular Imaging

A handwritten signature in black ink, appearing to read "Howard B. Fleishon".

Howard B. Fleishon, MD, MMM, FACR  
Chair, Board of Chancellors  
American College of Radiology

A handwritten signature in black ink, appearing to read "Laura Thevenot".

Laura Thevenot  
Chief Executive Officer  
American Society for Radiation Oncology