

APPENDIX P-3

RELEASE OF PATIENTS OR HUMAN RESEARCH SUBJECTS

Radioactive Material Licensees authorized for medical use may release from confinement patients or human research subjects (patients) who have been administered radioactive material if the TEDE to any other individual from exposure to the released patient is not likely to exceed 0.5 rem(5 mSv). Licensees must provide radiation safety instructions to patients released (or their parent or guardian) in accordance with RH-8420.

Section 9	Applicability
RH-8500	
RH-8530	
RH-8550	Y
RH-8600	Y
RH-8620	
RH-8630	
RH-8670	Y

RH-8420 requires that the licensee provide the released individual (patient) with instructions, including written instructions, on actions recommended to maintain doses to other individuals ALARA. If a breast-feeding infant or a child could receive a radiation dose as a result of the release of the patient, the instructions also shall also include:

- Guidance on the interruption or discontinuation of breast-feeding; and
- Information on the potential consequences of failure to follow the guidance.

The following example procedure provides guidance to the Applicant on a method for determining when:

- The licensee may authorize the release of a patient who has been administered radiopharmaceuticals or who has been treated with implants containing radioactive material (Section 1), and
- Instructions to the patient are required by RH-8420 (Section 2).
- The procedure lists activities for commonly used radionuclides and the corresponding dose rates with which a patient may be released in compliance with the dose limits in RH-8420.

Example Procedure for Release of Patients or Human Research Subjects Administered Radioactive Materials

RH-8420, “Release of Individuals Containing Radioactive Drugs or Implants”, permits a licensee to “...authorize the release from its control any individual who has been administered Iodine 131 as Sodium Iodide if:

1. The total patient concentration has been determined to be [33 milliCuries (1.22 gigabecquerels)] or less, or
2. If the total effective dose equivalent to any other individual from exposure to the released individual is not likely to exceed [0.5 rem five (5) millisievert] **and the criteria outlined in Arkansas’ Standard for Radiological Protection for Release of Patient Administered I-131 Sodium Iodide have been met.”**

NOTE: The Applicant must contact the Department for a copy of the “Standard for Radiological Protection for Release of Patient Administered I-131 Sodium Iodide”. The Applicant must commit in writing to follow the Department Standard if they are requesting approval to release patients who have been administered ≥ 33 millicuries of I-131 Sodium Iodide.

And,

“A licensee may authorize the release from its control of any individual who has been administered radioactive drugs other than Iodine 131 as Sodium Iodide or implants containing radioactive material if the total effective dose equivalent to any other individual from exposure to the released individual is not likely to exceed 0.5 rem (five (5) millisievert).”

The following dose calculations may be used to assist the Licensee in determining if a patient can be released in compliance with RH-8420. In this Sub-Appendix, the individual or human research subject to whom the radioactive material has been administered is called the “patient”.

Release Equation

The activities at which patients could be released were calculated by using, as a starting point, the method discussed in the National Council on Radiation Protection and Measurements (NCRP) Report No. 37, “Precautions in the Management of Patients Who Have Received Therapeutic Amounts of Radionuclides”.

NCRP Report No. 37 uses the following equation to calculate the exposure until time t at a distance r from the patient:

Equation 1:

$$D(t) \equiv \frac{34.6\Gamma Q_0 T_p (1 - e^{-0.693t/T_p})}{r^2}$$

Where:

- D(t) = Accumulated exposure at time t, in roentgens
- 34.6 = Conversion factor of 24 hrs/day times the total integration of decay (1.44)
- Γ = Specific gamma ray constant for a point source, R/mCi-hr at 1 cm
- Q_0 = Initial activity of the point source in millicuries, at the time of the release
- T_p = Physical half-life in days
- r = Distance from the point source to the point of interest, in centimeters
- t = Exposure time in days.

This appendix uses the NCRP equation (Equation 1) in the following manner to calculate the activities at which patients may be released.

- The dose to an individual likely to receive the highest dose from exposure to the patient is taken to be the dose to total decay. Therefore, $(1 - e^{-0.693t/T_p})$ is set equal to 1.
- It is assumed that 1 roentgen is equal to 1 rem (10 millisieverts).
- The exposure-rate constants and physical half-lives for radionuclides typically used in nuclear medicine and brachytherapy procedures are given in Supplement A to this appendix.
- Default activities at which patients may be released are calculated using the physical half-lives of the radionuclides and do not account for the biological half-lives of the radionuclides.
- When release is based on biological elimination (i.e., the effective half-life) rather than just the physical half-life of the radionuclide, Equation 1 is modified to account for the uptake and retention of the radionuclide by the patient, as discussed in Supplement B.2.
- For radionuclides with a physical half-life greater than 1 day and no consideration of biological elimination, it is assumed that the individual likely to receive the highest dose from exposure to the patient would receive a dose of 25% of the dose to total decay (0.25 in Equation U.2), at a distance of 1 meter. Selection of 25% of the dose to total decay at 1 meter for estimating the dose is based on measurements discussed in the supporting regulatory analysis that indicate the dose calculated using an occupancy factor, E , of 25% at 1 meter is conservative in most normal situations.
- For radionuclides with a physical half-life less than or equal to 1 day, it is difficult to justify an occupancy factor of 0.25, because relatively long-term averaging of behavior cannot be assumed. Under this situation, occupancy factors from 0.75 to 1.0 may be more appropriate.

Thus, for radionuclides with a physical half-life greater than 1 day:

Equation 2:

$$D(\infty) = \frac{34.6 \Gamma Q_0 T_p (0.25)}{(100 \text{ cm})^2}$$

For radionuclides with a physical half-life less than or equal to 1 day, and if an occupancy factor of 1.0 is used:

Equation 3:

$$D(\infty) = \frac{34.6 \Gamma Q_0 T_p (1)}{(100 \text{ cm})^2}$$

Equations 2 and 3 calculate the dose from external exposure to gamma radiation. These equations do not include the dose from internal intake by household members and members of the public, because the dose from intake by other individuals is expected to be small for most radiopharmaceuticals (less than a few percent), relative to the external gamma dose (see “Internal Dose” of Supplement B). Further, the equations above do not apply to the dose to breast-feeding infants or children who continue to breast-feed. Patients who are breast-feeding an infant or child must be considered separately, as discussed in Item.1.1, “Release of Patients Based on Administered Activity”.

1. Release Criteria

Licensees should use one of the following options to release a patient to whom unsealed radioactive material or implants containing radioactive material have been administered in accordance with regulatory requirements.

1.1 Release of Patients Based on Administered Activity

In compliance with the dose limit in RH-8420.b, licensees may release patients from licensee control if the activity administered is no greater than the activity in Column 1 of Table P-3.1. The activities in Table P-3.1 are based on a total effective dose equivalent of 0.5 rem (5 millisieverts) to an individual using the following conservative assumptions:

- Administered activity;
- Physical half-life;
- Occupancy factor of 0.25 at 1 meter for physical half-lives greater than 1 day and, to be conservative, an occupancy factor of 1 at 1 meter for physical half-lives less than or equal to 1 day; and
- No shielding by tissue.

The total effective dose equivalent is approximately equal to the external dose because the internal dose is a small fraction of the external dose (see Section B.3, “Internal Dose” of Supplement B). In this case, no record of the release of the patient is required unless the patient is breast-feeding an infant or child, as discussed in Item 3.2, “Records of Instructions for Breast-Feeding Patients”. The licensee may demonstrate compliance by using the records of activity that are already required by RH-8307 and RH-8403.

If the activity administered exceeds the activity in Column 1 of Table P-3.1, the licensee may release the patient when the activity has decayed to the activity in Column 1 of Table P-3.1. In this case, RH-8420 requires a record because the patient’s release is based on the retained activity rather than the administered activity. The activities in Column 1 of Table P-3.1 were calculated using either Equation 2 or 3, depending on the physical half-life of the radionuclide.

If a radionuclide that is not listed in Table P-3.1 is administered, the licensee can demonstrate compliance with the regulation by maintaining, for Department inspection, calculation of the release activity that corresponds to the dose limit of 0.5 rem (5 millisieverts). Equation 2 or 3 may be used, as appropriate, to calculate the activity Q corresponding to 0.5 rem (5 millisieverts).

The release activities in Column 1 of Table P-3.1 do not include consideration of the dose to a breast-feeding infant or child from ingestion of radiopharmaceuticals contained in the patient's breast milk. When the patient is breast-feeding an infant or child, the activities in Column 1 of Table P-3.1 are not applicable to the infant or child. In all cases, it is necessary to give instructions as described in Items 2.2 and 2.3 as a condition for release. If failure to interrupt or discontinue could result in a dose to the breast-feeding infant or child in excess of 0.5 rem (5 millisieverts), a record that instructions were provided is required by RH-8420.

1.2 Release of Patients Based on Measured Dose Rate

Licenseses may release patients to whom radionuclides have been administered in amounts greater than the activities listed in Column 1 of Table P-3.1, provided the measured dose rate at 1 meter (from the surface of the patient) is no greater than the value in Column 2 of Table P-3.1 for that radionuclide. In this case, however, RH-8420 requires a record because the release is based on considering shielding by tissue.

If a radionuclide not listed in Table P-3.1 is administered and the licensee chooses to release a patient based on the measured dose rate, the licensee should first calculate a dose rate that corresponds to the 0.5 rem (5 millisieverts) dose limit. If the measured dose rate at 1 meter is no greater than the calculated dose rate, the patient may be released. A record of the release is required by RH-8420. The dose rate at 1 meter may be calculated from Equation 2 or 3, as appropriate, because the dose rate at 1 meter is equal to $\Gamma Q / 10,000 \text{ cm}^2$.

<p>NOTE: Additional requirements must be met for I-131 as Sodium Iodide. Licensees must commit to follow the "Standard for Radiological Protection for Release of Patient Administered I-131 Sodium Iodide". (RH-8420.a.2.)</p>
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1.3 Release of Patients Based on Patient-Specific Dose Calculations

Licenseses may release patients based on dose calculations using patient-specific parameters. With this method, based on RH-8420.b, the licensee must calculate the maximum likely dose to an individual exposed to the patient on a case-by-case basis. If the calculated maximum likely dose to an individual is no greater than 0.5 rem (5 millisieverts), the patient may be released. Using this method, licenseses may be able to release patients with activities greater than those listed in Column 1 of Table P-3.1 by taking into account the effective half-life of the radioactive material and other factors that may be relevant to the particular case. In this case, a record of the release is required by RH-8420. If the dose calculation considered retained activity, an occupancy factor less than 0.25 at 1 meter, effective half-life, or shielding by tissue, a record of the basis for the release is required by RH-8420.

Supplement B contains procedures for performing patient-specific dose calculations, and it describes how various factors may be considered in the calculations.

<p>NOTE: Additional requirements must be met for I-131 as Sodium Iodide. Licensees must commit to follow the "Standard for Radiological Protection for Release of Patient Administered I-131 Sodium Iodide". (RH-8420.a.2.)</p>
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Table P-3.1 Activities and Dose Rates for Authorizing Patient Release				
Radionuclide	COLUMN 1 Activity at or Below Which Patients May Be Released		COLUMN 2 Dose Rate at 1 Meter, at or Below Which Patients May Be Released*	
	(GBq)	(mCi)	(mSv/hr)	(mrem/hr)
Ag-111	19	520	0.08	8
Au-198	3.5	93	0.21	21
Cr-51	4.8	130	0.02	2
Cu-64	8.4	230	0.27	27
Cu-67	14	390	0.22	22
Ga-67	8.7	240	0.18	18
I-123	6	160	0.26	26
I-125	0.25	7	0.01	1
I-125 implant	0.33	9	0.01	1
I-131	1.2	33	0.07	7
In-111	2.4	64	0.2	20
Ir-192 implant	0.074	2	0.008	0.8
P-32	**	**	**	**
Pd-103 implant	1.5	40	0.03	3
Re-186	28	770	0.15	15
Re-188	29	790	0.2	20
Sc-47	11	310	0.17	17
Se-75	0.089	2	0.005	0.5
Sm-153	26	700	0.3	30
Sn-117m	1.1	29	0.04	4
Sr-89	**	**	**	**
Tc-99m	28	760	0.58	58
Tl-201	16	430	0.19	19
Y-90	**	**	**	**
Yb-169	0.37	10	0.02	2

Footnotes for Table P-3.1

- The activity values were computed based on 0.5 rem (5 millisieverts) total effective dose equivalent.
- * If the release is based on the dose rate at 1 meter in Column 2, the licensee must maintain a record as required by RH-8420, because the measurement includes shielding by tissue. See Item 3.1, “Records of Release”, for information on records.
 - ** Activity and dose rate limits are not applicable in this case because of the minimal exposures to members of the public resulting from activities normally administered for diagnostic or therapeutic purposes.

Notes: The milliCurie values were calculated using Equations 2 or 3 and the physical half-life. The gigabecquerel values were calculated using the milliCurie values and the conversion factor from milliCurie to gigabecquerel. The dose rate values are calculated using the milliCurie values and the exposure rate constants.

In general, the values are rounded to two significant figures; however, values less than 10 millicuries (0.37 gigabecquerel) or 10 millirem (0.1 millisieverts) per hour are rounded to one significant figure. Details of the calculations are provided in NUREG-1492.

2. Instructions for Release of Patients

This Section provides acceptable instructions for release of patients administered radioactive materials.

2.1 Basis for Requiring Instructions

Based on RH-8420, the released patients must be given instructions, including written instructions, on how to maintain doses to other individuals ALARA after the patients are released. If the patient is breast-feeding an infant or child, additional instructions must also be provided (see Item 2.2, “Additional Instructions for Release of Patients Who Could be Breast-Feeding After Release”).

2.2 Additional Instructions for Release of Patients Who Could Be Breast-Feeding After Release

The requirement in RH-8420 that a licensee provide instructions on the discontinuation or the interruption period of breast-feeding, and the consequences of failing to follow the recommendation, presumes that the licensee will inquire, as appropriate, regarding the breast-feeding status of the patient. The purpose of the instructions (e.g., on interruption or discontinuation) is to permit licensees to release a patient who could be breast-feeding an infant or child when the dose to the infant or child could exceed 0.5 rem (5 millisieverts) if there is no interruption of breast-feeding.

If the patient could be breast-feeding an infant or child after release the licensee must give the patient instructions on the discontinuation or interruption period for breast-feeding and the consequences of failing to follow the recommendation. The patient should also be informed if there would be no consequences to the breast-feeding infant or child. If information on the excretion of the radiopharmaceutical is not available, an acceptable method is to assume that 50% of the administered activity is excreted in the breast milk. The dose to the infant or child can be calculated by using the dose conversion factors given for a newborn infant by Stabin.

2.3 Content of Instructions

The instructions should be specific to the type of treatment given, such as permanent implants or radioiodine for hyperthyroidism or thyroid carcinoma, and they may include additional information for individual situations; however, the instructions should not interfere with or contradict the best medical judgment of physicians. The instructions may include the name of a knowledgeable contact person and that person's telephone number, in case the patient has any questions. Additional instructions appropriate for each modality, as shown in examples below, may be provided (refer to 2.3.1 and 2.3.2).

2.3.1 Instructions Regarding Radiopharmaceutical Administrations

For procedures involving radiopharmaceuticals, additional instructions may include the following:

- Maintaining distance from other persons, including separate sleeping arrangements.
- Minimizing time in public places (e.g., public transportation, grocery stores, shopping centers, theaters, restaurants, sporting events).
- Precautions to reduce the spread of radioactive contamination.
- The length of time each of the precautions should be in effect.

The Society of Nuclear Medicine published a pamphlet in 1987 that provides information for patients receiving treatment with radioiodine. This pamphlet was prepared jointly by the Society of Nuclear Medicine and NRC. The pamphlet contains blanks for the physician to fill in the length of time that each instruction should be followed. Although this pamphlet was written for the release of patients to whom less than 30 millicuries (1,110 megabecquerels) of iodine-131 had been administered, the Department still considers the instructions in this pamphlet to be an acceptable method for meeting the requirements of RH-8420, provided the times filled in the blanks are appropriate for the activity and the medical condition.

If additional instructions are required because the patient is breast-feeding, the instructions should include appropriate recommendations on whether to interrupt breast-feeding, the length of time to interrupt breast-feeding, or, if necessary, the discontinuation of breast-feeding. The instructions should include information on the consequences of failure to follow the recommendation to interrupt or discontinue breast-feeding. The consequences should be explained so that the patient will understand that, in some cases, breast-feeding after an administration of certain radionuclides should be avoided. For example, a consequence of procedures involving iodine-131 is that continued breast-feeding could harm the infant's or child's thyroid. Most diagnostic procedures involve radionuclides other than radioiodine and

there would be no consequences; guidance should simply address avoiding any unnecessary radiation exposure to the infant or child from breast-feeding. If the Society of Nuclear Medicine's pamphlet is given at release to a patient who is breast-feeding an infant or child, the pamphlet should be supplemented with information specified in RH-8420.

The requirement of RH-8420 regarding written instructions to patients who could be breast-feeding an infant or child is not in any way intended to interfere with the discretion and judgment of the physician in specifying the detailed instructions and recommendations.

2.3.2 Instructions Regarding Implants

For patients who have received implants, additional instructions may include the following:

A small radioactive source has been placed (implanted) inside your body. The source is actually many small metallic pellets or seeds, which are each about 1/3 to 1/4 of an inch long, similar in size and shape to a grain of rice. To minimize exposure to radiation to others from the source inside your body, you should do the following for days.

- **Stay at a distance of _____ feet from _____.**
- **Maintain separate sleeping arrangements.**
- **Minimize time with children and pregnant women.**
- **Do not hold or cuddle children.**
- **Avoid public transportation.**
- **Examine any bandages or linens that come into contact with the implant site for any pellets or seeds that may have come out of the implant site.**
- **If you find a seed or pellet that falls out:**
 - **Do not handle it with your fingers. Use something like a spoon or tweezers to place it in a jar or other container that you can close with a lid**
 - **Place the container with the seed or pellet in a location away from people.**

Notify _____ at telephone number _____ .

3. Records

3.1 Records of Release

RH-8420 requires that the licensee "...maintain a record of the basis for authorizing the release of an individual..." and "...a record of instructions provided to breast-feeding women..."

This record should include the patient identifier (in a way that ensures that confidential patient information is not traceable or attributable to a specific patient), the radioactive material administered, the administered activity, and the date of the administration. In addition, depending on the basis for release, records should include the following information:

- **For Immediate Release of a Patient Based on a Patient-Specific Calculation:** The equation used, including the patient-specific factors and their bases that were used in calculating the dose to the person exposed to the patient, and the calculated dose. The patient-specific factors (see Supplement B of this appendix) include the effective half-life and uptake fraction for each component of the biokinetic model, the time that the physical half-life was assumed to apply to retention, and the occupancy factor. The basis for selecting each of these values should be included in the record.
- **For Immediate Release of a Patient Based on Measured Dose Rate:** The results of the measurement, the specific survey instrument used, and the name of the individual performing the survey.
- **For Delayed Release of a Patient Based on Radioactive Decay Calculation:** The time of the administration, date and time of release, and the results of the decay calculation.
- **For Delayed Release of a Patient Based on Measured Dose Rate:** The results of the survey meter measurement, the specific survey instrument used, and the name of the individual performing the survey.

In some situations, a calculation may be case-specific for a class of patients who all have the same patient-specific factors. In this case, the record for a particular patient's release may reference the calculation for the class of patients.

Records, as required by RH-8420, must be kept in a manner that ensures the patient's confidentiality, that is, the records should not contain the patient's name or any other information that could lead to identification of the patient. These recordkeeping requirements may also be used to verify that licensees have proper procedures in place for assessing potential third-party exposure associated with and arising from exposure to patients who were administered radioactive material.

3.2 Records of Instructions for Breast-Feeding Patients

Records of instructions provided to breast-feeding women shall be maintained.

The record should include the patient's identifier (in a way that ensures that confidential patient information is not traceable or attributable to a specific patient), the radiopharmaceutical administered, the administered activity, the date of the administration, and whether instructions were provided to the patient who could be breast-feeding an infant or child.

Implementation

The purpose of this section is to provide information to licensees and applicants regarding the Department's intent for using this Sub-Appendix. Except in those cases in which a licensee proposes an acceptable alternative method for complying with RH-8420, the methods described in this Sub-Appendix will be used in the evaluation of a licensee's compliance with RH-8420.

The following references are provided to assist the Applicant/Licensee:

- National Council on Radiation Protection and Measurements (NCRP), "Precautions in the Management of Patients Who Have Received Therapeutic Amounts of Radionuclides", NCRP Report No. 37, October 1, 1970. (Available for sale from the NCRP, 7910 Woodmont Avenue, Suite 400, Bethesda, MD 20814-3095.)
- M. Stabin, "Internal Dosimetry in Pediatric Nuclear Medicine", in *Pediatric Nuclear Medicine*, edited by S. Treves, Springer Verlag, New York, 1995.
- "Guidelines for Patients Receiving Radioiodine Treatment", *Society of Nuclear Medicine*, 1987. This pamphlet may be obtained from the Society of Nuclear Medicine, 1850 Samuel Morse Drive, Reston, VA 20190-5316.

Supplement A

Table P-3.2 Half-Lives and Exposure Rate Constants of Radionuclides Used in Medicine		
Radionuclide	Physical Half-Life (days)¹	Exposure Rate Constant² (R/mCi-h at 1 cm)
Ag-111	7.45	0.15
Au-198	2.696	2.3
Cr-51	27.704	0.16
Cu-64	0.529	1.2
Cu-67	2.578	0.58
Ga-67	3.261	0.753
I-123	0.55	1.61
I-125	60.14	1.42
I-125 implant	60.14	1.114
I-131	8.04	2.2
In-111	2.83	3.21
Ir-192 implant	74.02	4.594
P-32	14.29	N/A ⁵
Pd-103 implant	16.96	0.865
Re-186	3.777	0.2
Re-188	0.708	0.26
Sc-47	3.351	0.56
Se-75	119.8	2
Sm-153	1.946	0.425
Sn-117m	13.61	1.48
Sr-89	50.5	N/A ⁵
Tc-99m	0.251	0.756
Tl-201	3.044	0.447
Yb-169	32.01	1.83
Y-90	2.67	N/A ⁵
Yb-169	32.01	1.83

Footnotes for Table P-3.2

- ¹ K.F. Eckerman, A.B. Wolbarst, and A.C.B. Richardson, “Federal Guidance Report No. 11, Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion”, Report No. EPA-520/1-88-020, Office of Radiation Programs, U.S. Environmental Protection Agency, Washington, DC, 1988.
- ² Values for the exposure rate constant for Au-198, Cr-51, Cu-64, I-131, Sc-47, and Se-75 were taken from the *Radiological Health Handbook*, U.S. Department of Health, Education, and Welfare, pp. 135, 1970. For Cu-67, I-123, In-111, Re-186, and Re-188, the values for the exposure rate constant were taken from D.E. Barber, J.W. Baum, and C.B. Meinhold, “Radiation Safety Issues Related to Radiolabeled Antibodies”, NUREG/CR-4444, U.S. NRC, Washington, DC, 1991. For Ag-111, Ga-67, I-125, Sm-153, Sn-117m, Tc-99m, Tl-201, and Yb-169, the exposure rate constants were calculated because the published values for these radionuclides were an approximation, presented as a range, or varied from one reference to another. Details of the calculation of the exposure rate constants are shown in Table A.2 of Appendix A to NUREG-1492, “Regulatory Analysis on Criteria for the Release of Patients Administered Radioactive Material”, U.S. NRC, February 1997.
- ³ R. Nath, A.S. Meigooni, and J.A. Meli, “Dosimetry on Transverse Axes of ¹²⁵I and ¹⁹²Ir Interstitial Brachytherapy Sources”, *Medical Physics*, Volume 17, Number 6, November/December 1990. The exposure rate constant given is a measured value averaged for several source models and takes into account the attenuation of gamma rays within the implant capsule itself.
- ⁴ A.S. Meigooni, S. Sabnis, R. Nath, “Dosimetry of Palladium-103 Brachytherapy Sources for Permanent Implants”, *Endocurietherapy Hyperthermia Oncology*, Volume 6, April 1990. The exposure rate constant given is an Aapparent@ value (i.e., with respect to an apparent source activity) and takes into account the attenuation of gamma rays within the implant capsule itself.
- ⁵ Not applicable (N/A) because the release activity is not based on beta emissions.

Supplement B

Procedures for Calculating Doses Based on Patient-Specific Factors

A licensee may release a patient to whom an activity with a value higher than the values listed in Column 1 of Table P-3.1 of this supplement has been administered if dose calculations using patient-specific parameters, which are less conservative than the conservative assumptions, show that the potential total effective dose equivalent to any individual would be no greater than 0.5 rem (5 millisieverts).

A record of the basis of the release is required by RH-8420 when the release of a patient is based on a patient-specific calculation that considered retained activity, an occupancy factor less than 0.25 at 1 meter, biological or effective half-life, or shielding by tissue. The following equation can be used to calculate doses:

Equation B-1:

$$D(t) = \frac{34.6 \Gamma Q_0 TE (1 - e^{-0.693t/T_p})}{r^2}$$

Where:

- D(t) = Accumulated dose to time t, in rem;
- 34.6 = Conversion factor of 24 hrs/day times the total integration of decay (1.44);
- Γ = Exposure rate constant for a point source, R/mCi x hr at 1 cm;
- Q_0 = Initial activity at the start of the time interval;
- T_p = Physical half-life, in days;
- E = Occupancy factor that accounts for different occupancy times and distances when an individual is around a patient;
- r = Distance in centimeters. This value is typically 100 cm; and
- t = Exposure time in days.

B.1 Occupancy Factor

B.1.1 Rationale for Occupancy Factors Used to Derive Table P-3.1

In Table P-3.1 in this Sub-Appendix, the activities at which patients could be released were calculated using the physical half-life of the radionuclide and an occupancy factor at 1 meter of either 0.25 (if the radionuclide has a half-life longer than 1 day) or 1.0 (if the radionuclide has a half-life less than or equal to 1 day). The basis for the occupancy factor of 0.25 at 1 meter is that measurements of doses to family members, as well as considerations of normal human behavior (as discussed in the supporting regulatory analysis (Ref. B-1)), suggest that an occupancy factor of 0.25 at 1 meter, when used in combination with the physical half-life, will produce a generally conservative estimate of the dose to family members when instructions on minimizing doses to others are given.

An occupancy factor of 0.25 at 1 meter may not be appropriate when the physical half-life is less than or equal to 1 day, and hence, the dose is delivered over a short time.

Specifically, the assumptions regarding patient behavior that led to an occupancy factor of 0.25 at 1 meter include the assumption that the patient will not be in close proximity to other individuals for several days; however, when the dose is from a short-lived radionuclide, the time that individuals spend in close proximity to the patient immediately following release will be most significant because the dose to other individuals could be a large fraction of the total dose from the short-lived radionuclide. Thus, to be conservative when providing generally applicable release quantities that may be used with little consideration of the specific details of a particular patient's release, the values calculated in Table P-3.1 were based on an occupancy factor of 1 at 1 meter when the half-life is less than or equal to 1 day. If information about a particular patient implies the assumptions were too conservative, licensees may consider case-specific conditions. Conversely, if young children are present in the household of the patient who is to be discharged, conservative assumptions about occupancy may be appropriate.

B.1.2 Occupancy Factors to Consider for Patient-Specific Calculations

The selection of an occupancy factor for patient-specific calculations will depend on whether the physical or effective half-life of the radionuclide is used and whether instructions are provided to the patient before release. The following occupancy factors, E , at 1 meter, may be useful for patient-specific calculations:

- $E = 0.75$ when a physical half-life, an effective half-life, or a specific time period under consideration (e.g., bladder holding time) is less than or equal to 1 day.
- $E = 0.25$ when an effective half-life is greater than 1 day, if the patient has been given instructions, such as:
 - Maintain a prudent distance from others for at least the first 2 days;
 - Sleep alone in a room for at least the first night;
 - Do not travel by airplane or mass transportation for at least the first day;
 - Do not travel on a prolonged automobile trip with others for at least the first 2 days;
 - Have sole use of a bathroom for at least the first 2 days; and
 - Drink plenty of fluids for at least the first 2 days.
- $E = 0.125$ when an effective half-life is greater than 1 day if the patient has been given instructions, such as:
 - Follow the instructions for $E = 0.25$ above;
 - Have few visits by family or friends for at least the first 2 days.
- In a two-component model (e.g., uptake of iodine-131 using thyroidal and extrathyroidal components), if the effective half-life associated with one component is less than or equal to one day but is greater than one day for the other component, it is more justifiable to use the occupancy factor associated with the dominant component for both components.

Example 1: Calculate the maximum likely dose to an individual exposed to a patient who has received 60 millicuries (2,220 megabecquerels) of iodine-131. The patient received instructions to maintain a prudent distance from others for at least 2 days, lives alone, drives home alone, and stays at home for several days without visitors.

Solution: The dose to total decay ($t = \infty$) is calculated based on the physical half-life using Equation B-1. (This calculation illustrates the use of physical half-life. To account for biological elimination, calculations described in the next section should be used.)

$$D(\infty) = \frac{34.6 \Gamma Q_0 T_p E}{r^2}$$

Because the patient has received instructions for reducing exposure as recommended for an occupancy factor of $E = 0.125$, the occupancy factor of 0.125 at 1 meter may be used.

$$D(\infty) = \frac{34.6 (2.2 R \cdot \text{cm}^2 / \text{mCi} \cdot \text{hr})(60 \text{mCi})(8.04 \text{d})(0.125)}{(100 \text{cm})^2}$$

$$D(\infty) = 0.459 \text{ rem (4.59 millisieverts)}$$

Since the dose is less than 0.5 rem (5 millisieverts), the patient may be released, provided that the **Arkansas Standard for Radiological Protection for Release of Patient Administered I-131 Sodium Iodide** has been met.” Also, RH-8420 requires that instructions be given to the patient on maintaining doses to others as low as is reasonably achievable. A record of the calculation must be maintained, pursuant to RH-8420.

B.2 Effective Half-Life

A licensee may take into account the effective half-life of the radioactive material to demonstrate compliance with the dose limits for individuals exposed to the patient that are stated in RH-8420. The effective half-life is defined as:

Equation B-2:

$$T_{eff} = \frac{T_b \times T_p}{T_b + T_p}$$

Where:

T_b = Biological half-life of the radionuclide and

T_p = Physical half-life of the radionuclide.

The behavior of iodine-131 can be modeled using two components: extrathyroidal iodide (i.e., existing outside of the thyroid) and thyroidal iodide following uptake by the thyroid. The effective half-lives for the extrathyroidal and thyroidal fractions (i.e., F_1 and F_2 , respectively) can be calculated with the following equations.

Equation B-3:

$$T_{1eff} = \frac{T_{b1} \times T_p}{T_{b1} + T_p}$$

Equation B-4:

$$T_{2eff} = \frac{T_{b2} \times T_p}{T_{b2} + T_p}$$

Where:

T_{b1} = Biological half-life for extrathyroidal iodide;

T_{b2} = Biological half-life of iodide following uptake by the thyroid; and

T_p = Physical half-life of iodine-131.

However, simple exponential excretion models do not account for: (a) the time for the iodine-131 to be absorbed from the stomach to the blood; and (b) the holdup of iodine in the urine while in the bladder. Failure to account for these factors could result in an underestimate of the dose to another individual. Therefore, this supplement makes a conservative approximation to account for these factors by assuming that, during the first 8 hours after the administration, about 80% of the iodine administered is removed from the body at a rate determined only by the physical half-life of iodine-131.

Thus, an equation to calculate the dose from a patient administered iodine-131 may have three components. First is the dose for the first 8 hours (0.33 day) after administration. This component comes directly from Equation B-1, using the physical half-life and a factor of 80%. Second is the dose from the extrathyroidal component from 8 hours to total decay. In this component, the first exponential factor represents the activity at $t = 8$ hours based on the physical half-life of iodine-131. The second exponential factor represents the activity from $t = 8$ hours to total decay based on the effective half-life of the extrathyroidal component. The third component, the dose from the thyroidal component for 8 hours to total decay, is calculated in the same manner as the second component. The full equation is shown as Equation B-5.

Equation B-5:

$$D(\infty) = \frac{34.6 \Gamma Q_0}{(100 \text{ cm})^2} \{ E_1 T_p (0.8)(1 - e^{-0.693(0.33)/T_p}) + e^{-0.693(0.33)/T_p} E_2 F_1 T_{1eff} + e^{-0.693(0.33)/T_p} E_2 F_2 T_{2eff} \}$$

Where:

- F_1 = Extrathyroidal uptake fraction;
- F_2 = Thyroidal uptake fraction;
- E_1 = Occupancy factor for the first 8 hours; and
- E_2 = Occupancy factor from 8 hours to total decay.

All the other parameters are as defined in Equations B-1, B-3, and B-4. Acceptable values for F_1 , $T_{1\text{ eff}}$, F_2 , and $T_{2\text{ eff}}$ are shown in Table 6 for thyroid ablation and treatment of thyroid remnants after surgical removal of the thyroid for thyroid cancer. If these values have been measured for a specific individual, the measured values may be used.

The record of the patient's release required by RH-8420.

Example 2, Thyroid Cancer: Calculate the maximum likely dose to an individual exposed to a patient to whom 150 milliCuries (5550 megabecquerels) of iodine-131 have been administered for the treatment of thyroid remnants and metastasis.

Solution: In this example, we will calculate the dose by using Equation B-5 to account for the elimination of iodine-131 from the body, based on the effective half-lives appropriate for thyroid cancer. The physical half-life and the exposure rate constant are from Table P-3.2. The uptake fractions and effective half-lives are from Table P-3.3. An occupancy factor, E , of 0.75 at 1 meter, will be used for the first component because the time period under consideration is less than 1 day; however, for the second and third components, an occupancy factor of 0.25 will be used, because: (1) the effective half-life associated with the dominant component is greater than 1 day; and (2) patient-specific questions were provided to the patient to justify the occupancy factor (see Section B.1.2, "Occupancy Factors to Consider for Patient-Specific Calculations", of this Supplement).

Table P-3.3 Uptake Fractions and Effective Half-Lives for Iodine-131 Treatments						
	Extrathyroidal Component			Thyroidal Component		
Medical Condition	Uptake Fraction F₁	Effective Half-Life (day)	T_{1eff}	Uptake Fraction F₂	Effective Half-Life (day)	T_{2eff}
Hyperthyroidism	0.201	0.322		0.801	5.21	
Post Thyroidectomy for Thyroid Cancer	0.953	0.322		0.053	7.32	

Footnotes for Table P-3.3

- ¹ M.G. Stabin et al., “Radiation Dosimetry for the Adult Female and Fetus from Iodine-131 Administration in Hyperthyroidism”, *Journal of Nuclear Medicine*, Volume 32, Number 5, May 1991. The thyroid uptake fraction of 0.80 was selected as one that is seldom exceeded by the data shown in Figure 1 in this referenced document. The effective half-life of 5.2 days for the thyroidal component was derived from a biological half-life of 15 days, which was obtained from a straight-line fit that accounts for about 75% of the data points shown in Figure 1 of the *Journal of Nuclear Medicine* document.
- ² International Commission on Radiological Protection (ICRP), “Radiation Dose to Patients from Radiopharmaceuticals”, ICRP Publication No. 53, March 1987. (Available for sale from Pergamon Press, Inc., Elmsford, NY 10523.) The data in that document suggest that the extrathyroidal component effective half-life in normal subjects is about 0.32 days. Lacking other data, this value is applied to hyperthyroid and thyroid cancer patients. For thyroid cancer, the thyroidal component effective half-life of 7.3 days is based on a biological half-life of 80 days (adult thyroid), as suggested in the ICRP document.
- ³ The thyroidal uptake fraction of 0.05 was recommended by Dr. M. Pollycove, M.D., NRC medical visiting fellow, as an upper-limit post-thyroidectomy for thyroid cancer.

Substituting the appropriate values into Equation B-5, the dose to total decay is:

$$\begin{aligned}
 D(\infty) &= \frac{(34.6) (2.2) (150)}{(100 \text{ cm})^2} \{ (0.75) (8.04) (0.8) (1 - e^{-0.693 (0.33) / 8.04}) \\
 &+ e^{-0.693 (0.33) / 8.04} (0.25) (0.95) (0.32) \\
 &+ e^{-0.693 (0.33) / 8.04} (0.25) (0.05) (7.3) \}
 \end{aligned}$$

$$D(\infty) = 0.340 \text{ rem (3.40 millisieverts)}$$

Therefore, thyroid cancer patients to whom 150 milliCuries (5550 megabecquerels) of iodine-131 or less has been administered would not have to remain under licensee control and could be released under RH-8420, provided that the criteria in **Arkansas Standard for Radiological Protection for Release of Patient Administered I-131 Sodium Iodide** has been met, and assuming that the foregoing assumptions can be justified for the individual patient's case and that the patient is given instructions.

In the example above, the thyroidal fraction, $F_2 = 0.05$, is a conservative assumption for persons who have had surgery to remove thyroidal tissue. If F_2 has been measured for a specific patient, the measured value may be used.

Example 3, Hyperthyroidism: Calculate the maximum likely dose to an individual exposed to a patient to whom 55 millicuries (2035 megabecquerels) of iodine-131 has been administered for the treatment of hyperthyroidism (i.e., thyroid ablation).

Solution: In this example, we will again calculate the dose using Equation B-5, Table P-3.2, and Table P-3.3, to account for the elimination of iodine-131 from the body by using the effective half-lives appropriate for hyperthyroidism. An occupancy factor, E , of 0.25 at 1 meter will be used for the second and third components of the equation because patient-specific instructions were provided to justify the occupancy factor (see Section B.1.2, "Occupancy Factors to Consider for Patient-Specific Calculations").

Substituting the appropriate values into Equation B-5, the dose to total decay is:

$$\begin{aligned}
 D(\infty) &= \frac{(34.6)(2.2)(55)}{(100 \text{ cm})^2} \{ (0.75)(8.04)(0.8)(1 - e^{-0.693(0.33)/8.04}) \\
 &+ e^{-0.693(0.33)/8.04} (0.25)(0.20)(0.32) \\
 &+ e^{-0.693(0.33)/8.04} (0.25)(0.80)(5.2) \}
 \end{aligned}$$

$$D(\infty) = 0.486 \text{ rem (4.86 millisieverts)}$$

Therefore, hyperthyroid patients to whom 55 millicuries (2035 megabecquerels) of iodine-131 has been administered would not have to remain under licensee control and could be released, under RH-8420, provided that the criteria in **Arkansas Standard for Radiological Protection for Release of Patient Administered I-131 Sodium Iodide** has been met, and when the occupancy factor of 0.25 in the second and third components of the equation is justified.

In the example above, the thyroidal fraction $F_2 = 0.8$ is a conservative assumption for persons who have this treatment for hyperthyroidism. If F_2 has been measured for a specific patient, the measured value may be used.

B.3 Internal Dose

For some radionuclides, such as iodine-131, there may be concerns that the internal dose of an individual from exposure to a released patient could be significant. A rough estimate of the maximum likely committed effective dose equivalent from internal exposure can be calculated from Equation B-6.

Equation B-6:

$$D_i = Q (10^{-5})(DCF)$$

Where:

- D = Maximum likely internal committed effective dose equivalent to the individual exposed to the patient in rem;
- Q = Activity administered to the patient in millicuries;
- 10^{-5} = Assumed fractional intake; and
- DCF = Dose conversion factor to convert an intake in milliCuries to an internal committed effective dose equivalent (such as tabulated in Reference B-2).

Equation B-6 uses a value of 10^{-5} as the fraction of the activity administered to the patient that would be taken in by the individual exposed to the patient. A common rule of thumb is to assume that no more than 1 millionth of the activity being handled will become an intake to an individual working with the material. This rule of thumb was developed in reference B-3 for cases of worker intakes during normal workplace operations, worker intakes from accidental exposures, and public intakes from accidental airborne releases from a facility, but it does not specifically apply to cases of intake by an individual exposed to a patient. However, two studies (Refs. B-4 and B-5) regarding the intakes of individuals exposed to patients administered iodine-131, indicated that intakes were generally of the order of 1 millionth of the activity administered to the patient and that internal doses were far below external doses. To account for the most highly exposed individual and to add a degree of conservatism to the calculations, a fractional transfer of 10^{-5} has been assumed.

Example 4, Internal Dose: Using the ingestion pathway, calculate the maximum internal dose to a person exposed to a patient to whom 33 millicuries (1221 megabecquerels) of iodine-131 has been administered. The ingestion pathway was selected because it is likely that most of the intake would be through the mouth or through the skin, which is most closely approximated by the ingestion pathway.

Solution: This is an example of the use of Equation B-6. The dose conversion factor DCF for the ingestion pathway is 53 rem/millicurie from Table 2.2 of Reference B-2.

Substituting the appropriate values into Equation B-6, the maximum internal dose to the person is:

$$D_i = (33 \text{ mCi})(10^{-5})(53 \text{ rem/mCi})$$

$$D_i = 0.017 \text{ rem (0.17 millisieverts)}$$

Using Equation B-1 and assuming the patient has received instructions for reducing exposure as required by RH-8420 for an occupancy factor of 0.25, the external dose is approximately 0.5 rem (5 millisieverts). Thus, the internal dose is about 3% of the external dose due to gamma rays. Internal doses may be ignored in calculations of total dose if they are likely to be less than 10% of the external dose because the internal dose due to this source is small in comparison to the magnitude of uncertainty in the external dose.

The conclusion that internal contamination is relatively unimportant in the case of patient release was also reached by the NCRP. The NCRP addressed the risk of intake of radionuclides from patients' secretions and excreta in NCRP Commentary No. 11, "Dose Limits for Individuals Who Receive Exposure from Radionuclide Therapy Patients" (Ref. B-6). The NCRP concluded, "Thus, a contamination incident that could lead to a significant intake of radioactive material is very unlikely.

Example 5, Internal Dose: Calculate the maximum internal dose to a person exposed to a patient to whom 150 millicuries (5550 megabecquerels) of iodine-131 has been administered for the treatment of thyroid remnants and metastasis.

Solution: In this example, we will again calculate the dose using Equation B-6 and selecting the ingestion pathway. Substituting the appropriate values into Equation B-6, the maximum internal dose to the person is:

$$D_i = (150 \text{ mCi})(10^{-5})(53 \text{ rem/mCi})$$

$$D_i = 0.08 \text{ rem (0.80 millisieverts)}$$

In this case, the external dose to the other person from Example 2, Thyroid Cancer, was approximately 0.34 rem (3.4 millisieverts), while the internal dose would be about 0.08 rem (0.80 millisieverts). Thus, the internal dose is about 24% of the external gamma dose. Therefore, the internal and external doses must be summed to determine the total dose; 0.42 rem (4.2 millisieverts).

References for Supplement B

- B-1. S. Schneider and S.A. McGuire, "Regulatory Analysis on Criteria for the Release of Patients Administered Radioactive Material", U.S. NRC, NUREG-1492, February 1997.
- B-2. K.F. Eckerman, A.B. Wolbarst, and A.C.B. Richardson, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion", Federal Guidance Report No.11, U. S. Environmental Protection Agency, Washington, DC, 1988.

- B-3. A. Brodsky, “Resuspension Factors and Probabilities of Intake of Material in Process (or ‘Is 10^{-6} a Magic Number in Health Physics?’),@ *Health Physics*, Volume 39, Number 6, 1980.
- B-4. R.C.T. Buchanan and J.M. Brindle, “Radioiodine Therapy to Out-patients - The Contamination Hazard”, *British Journal of Radiology*, Volume 43, 1970.
- B-5. A.P. Jacobson, P.A. Plato, and D. Toeroek, “Contamination of the Home Environment by Patients Treated with Iodine-131”, *American Journal of Public Health*, Volume 68, Number 3, 1978.
- B-6. National Council on Radiation Protection and Measurements, “Dose Limits for Individuals Who Receive Exposure from Radionuclide Therapy Patients”, Commentary No. 11, February 28, 1995.