



# **Permanent Implant Brachytherapy Medical Event Definition**

**Michael Fuller**

**Team Leader**

**Medical Radiation Safety Team**

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# **Background**

- In **SECY-05-0234, the Staff recommended for all Permanent Implant Brachytherapy, medical events should be defined in terms of total source strength, not absorbed dose**
- In **SRM-SECY-05-0234, the Commission approved Staff's recommendation**

## **Background (con't)**

- In **SECY-08-0080**, the Staff provided the commission with the proposed modified rule for the use of total activity rather than absorbed dose
- In **SRM-SECY-08-0080**, the Commission approved the proposed rule

## **Background (con't)**

- In SECY-10-0062, the Staff provided the Commission with a reproposed rule that added activity-based criteria for the definition of a ME for Permanent Implant Brachytherapy, plus requirements for training, and other requirements**

## **Background (con't)**

- In SRM-SECY-10-0062, the Commission disapproved the re-proposed rule and directed the Staff to hold a series of public stakeholder workshops**

# **Discussion**

- **How do we appropriately balance between the medical community's desire to define a medical event in terms of clinical significance with NRC's need to have mistakes in the process reported, even if there is no actual negative consequence to the patient?**

# **Acronyms**

- **ME: Medical Events**
- **SECY: Office of the Secretary**
- **SRM: Staff Requirements Memorandum**