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Your Hot Lab is **NOT** a Pharmacy

For many years, Nuclear Medicine Technologists have been told that their Hot lab is subject to certain rules promulgated by the US Pharmacopeia, such as USP 797 and 825.

Based on a conversation several years ago with the Vice Chairman of the Florida Pharmacy Board, my contention has long been that a Hot Lab is not a pharmacy and therefore the USP guidance and the Florida pharmacy regulations do not apply. The current Florida pharmacy regulations clearly state a Nuclear Medicine Hot Lab is not a pharmacy; it therefore seems clear to me that no pharmacy regulations can apply to a Nuclear Medicine Hot Lab.

Here is the pertinent section of the Florida pharmacy regs:

Section 465.003 Definitions, 1(a)(3) states: *"The term "nuclear pharmacy" includes every location where radioactive drugs and chemicals within the classification of medicinal drugs are compounded, dispensed, stored, or sold. The term "nuclear pharmacy" does not include hospitals licensed under chapter 395 or the nuclear medicine facilities of such hospitals."*

If it's not a pharmacy, then neither USP guidance nor Florida pharmacy regulations apply.

Sincerely,

Kenneth A. Coleman, ME, DABMP, DABSNM
President & Senior Medical Physicist