



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 18, 2000

Mr. Charles H. Rose  
American Association for Nuclear Cardiology, Inc.  
5660 Airport Boulevard, Suite 101  
Boulder, Co 80301

SUBJECT: 10 CFR 35.980 REQUIREMENTS

Dear Mr. Rose:

I am responding to your December 23, 1999, letter to Mr. Charles L. Cain, (Enclosure 1), requesting clarification for a hypothetical case concerning the requirements for an authorized nuclear pharmacist (Enclosure 2).

NRC regulations require, among other things, that the pharmacist complete: (1) a structured educational program that includes supervised experience in a nuclear pharmacy involving a number of specific tasks [10 CFR 35.980(b)(1)]; and (2) a written certification, signed by a preceptor authorized nuclear pharmacist, that the training required in 10 CFR 35.980 (b)(1) was satisfactorily completed and that the individual achieved a level of competency sufficient to independently operate a nuclear pharmacy [10 CFR 35.980(b)(2)].

The pharmacist described in your hypothetical case does not appear to meet these requirements. In order to meet the first requirement, your hypothetical nuclear medicine facility needs a State "nuclear pharmacy license" for its nuclear medicine preparation activities. (Note: If the State issues only "pharmacy licenses" to its nuclear pharmacies, then a pharmacy license would be acceptable.) Further, the supervised experience at the nuclear pharmacy has to be in a structured educational program. Finally, your hypothetical pharmacist would not meet the second requirement, if anyone other than an authorized nuclear pharmacist signed the preceptor statement.

If a licensee requested a specific exemption, pursuant to 35.19, from the training and experience requirements of 35.980, to have an individual that did not meet these requirements listed as an authorized nuclear pharmacist on the license, the individual's training and experience requirements could be reviewed on a case-by-case basis.

If you have additional questions, please contact Donna-Beth Howe, PhD, at (301-415-7848)

Sincerely,

John W. Hickey  
Materials Safety and  
Inspection Branch, IMNS, NMSS

Enclosures:

1. Letter Dated December 23, 1999
2. Training Requirements For An  
Authorized Nuclear Pharmacist

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/RA/

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Distribution:

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*no legal objection*

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