

American Association for Nuclear Cardiology, Inc.

Professionals Dedicated to Diagnostic Accuracy

3 March 2000

Dated Response Request

Donald A. Cool, Director
Division of Industrial and Medical Nuclear Safety
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike, 3rd Floor
Rockville, MD 20852
Phone: 301-415-7197

Dear Mr. Cool:

Please advise us on the regulatory compliance issues that may be present in the following situation:

A multi-practice specialty has a gamma camera in their facility for imaging their patients. One of the four physicians in the group is the Authorized User on their license. The other three physicians may interpret images from the nuclear procedures, under the supervision of their Authorized User colleague.

The Authorized User is planning to be absent for several days. In preparation for that absence, he/she arranges to have another colleague in the practice take medical responsibility for the procedures. He/she also arranges to be assured that the RSO coverage is established. The site will only perform diagnostic procedures during his/her absence and only following existing standing orders. The Authorized User provides a telephone contact number to be used if an emergency occurs.

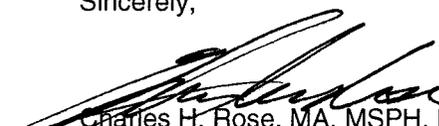
Under these, pre-arranged circumstances, is the site in compliance with your regulations?

If the answer is No, they are not in compliance, please advise us as to:

1. What constitutes an absence?
 - a) Distance
 - b) Duration
 - c) Availability
2. Would your agency cite an office or a hospital for this infraction?
3. What level of non-compliance would be enforced under these circumstances?

Your prompt response would be appreciated.

Sincerely,


Charles H. Rose, MA, MSPH, D(ABSNM)
Executive Director

Enclosure 1