

June 11, 2001

The American Board of Medical Physics  
ATTN: Lawrence E. Reinstein, Ph.D, Chairman  
P.O. Box 1502  
Galesburg, Illinois 61402-1502

Dear Dr. Reinstein:

I am responding to your letter of July 10, 2000, and Dr. Michael Gillin's e-mail to Sam Jones dated October 26, 2000. Dr. Gillin's e-mail asks questions related to Commission recognition of the American Board of Medical Physics (ABMP) certification process, under the requirements established in sections 35.51(a) and (b) of the new 10 CFR Part 35.

To qualify for Commission recognition, section 35.51(a) requires that a board certification process must include all of the training and experience requirements contained in section 35.51(b). These requirements include tasks involving teletherapy units, remote afterloaders, and gamma stereotactic units (GSUs), as applicable. Dr. Gillin asks about the interpretation of the word's "all and "as applicable". In addition, he notes that there are limited opportunities for medical physicists to receive training on GSUs, and asks whether the regulation could be interpreted in any of the following ways: (1) certification candidates must spend at least one day at a medical institution with a GSU, or (2) candidates must read about tasks involving GSUs as part of their work experience, or (3) ABMP should inform NRC that ABMP certification covers all tasks except those involving GSUs.

With respect to the first two interpretations, the limited training described does not appear adequate to qualify a candidate to function independently as a medical physicist for licensed GSU activities. If the ABMP wishes to request recognition, the ABMP would have to evaluate its entire certification process, and make a determination that its process includes training and work experience for all the tasks listed in 35.51(b), and includes a requirement that a preceptor certify in writing that the candidate is qualified to function independently as a medical physicist for remote afterloaders, teletherapy units, and GSUs.

With respect to the third interpretation, the NRC would not recognize a board certification process which only partially covered the requirements in 35.51(b). However, note that ABMP-certified persons could still be individually authorized to be medical physicists, if the licensee submits an amendment request which demonstrates that the person meets the requirements in 35.51(b) for one or more types of therapeutic units, as applicable. The phrase, "as applicable", in 35.51(b) applies to this latter process, but does not apply to recognition of a board certification process under 35.51(a).

Dr. Gillin also states that he believes that the current requirements of the ABMP meet the training and experience requirements for Radiation Safety Officers (RSOs). Accordingly, the ABMP may request recognition under section 35.50(a), if the board concludes that its certification process includes all of the requirements in section 35.50(b), including the requirement that candidates complete one year of full-time radiation safety experience under the supervision of an individual identified as an RSO on a license, and the requirement that candidates obtain written certification, signed by a preceptor RSO, that the individual has achieved a level of radiation safety knowledge sufficient to function independently as a RSO for a medical use licensee.

Note that persons already named as medical physicists on licenses may also be eligible to be authorized as RSOs in accordance with 35.50(c) and 35.57(a).

If you have any further questions, please contact Dr. Robert Ayres at 301-415-5746 or e-mail at [rx1@nrc.gov](mailto:rx1@nrc.gov) .

Sincerely,

/RA/

John W. N. Hickey, Chief  
Materials Safety and Inspection Branch  
Division of Industrial and Medical  
Nuclear Safety

cc: Michael Gillin, Ph.D.

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