

May 31, 2002

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, Dr. Michael Gillin's e-mail to Sam Jones dated October 26, 2000, and Dr. Charles Coffey's letter of September 28, 2001. Dr. Gillin's e-mail asks questions related to Commission recognition of the American Board of Medical Physics (ABMP) certification process, and the new 10 CFR 35.51(a) and (b) "Training for an authorized medical physicist" (AMP). Dr. Coffey's letter provides a statement on behalf of the American Association of Physicists in Medicine (AAPM) regarding certification of medical physicists.

Please note that the revised Part 35 was issued on April 24, 2002, and the full text of the rulemaking (in PDF format) may be viewed on our web site at http://ruleforum.llnl.gov/cgi-bin/downloader/final_lib/280-0156.pdf, or just the rule itself may be viewed at http://ruleforum.llnl.gov/cgi-bin/downloader/final_lib/280-0161.pdf. The effective date of the new rule is October 24, 2002, but there is a 2-year transition period for the new training and experience requirements, so the previous recognition of the ABMP in 10 CFR 35.961 will remain in effect for 2 years from the effective date of the new rule. During this transition period, the NRC staff will continue working with the medical community to resolve any concerns with implementing the training and experience requirements.

Under 10 CFR 35.51(a), an individual may be designated as an authorized medical physicist if he or she is certified by a specialty board whose certification includes all of the training and experience (T&E) requirements contained in section 35.51(b), and whose certification has been recognized by the Commission or an Agreement State. These requirements include tasks involving sealed sources and brachytherapy sources, teletherapy units, remote afterloading units, and gamma stereotactic radiosurgery units (GSUs), as applicable. Dr. Gillin asks about the interpretation of the words "all of the training and experience requirements in §35.51(b)" and "as applicable" in §35.51(b)(1). In addition, he notes that there are limited opportunities for medical physicists to receive training on GSUs, and asks whether the regulations 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.

The situations covered in the first two interpretations are still under review. The American Association of Physicists in Medicine (AAPM) has proposed training criteria for medical physicists to meet 35.51(b). We will work with our Advisory Committee on Medical Uses of Isotopes and other stakeholders to address this issue. The NRC Advisory Committee on Medical Use of Isotopes has established a subcommittee to develop recommendations on training and experience issues. Your letter and those from the other interested parties

(cited previously) will be provided to this subcommittee for their consideration. We would welcome any additional comments from your Board on concerns related to implementing the training and experience requirements in the new Part 35. We would appreciate receiving any such comments by June 24, 2002.

With respect to the third interpretation, if ABMP determines that its board certification process partially covers the requirements in §35.51(b), AMP may request recognition for the covered areas. For example, if the certification process covers 10 CFR 35.67, 35.633, 35.643, and 35.652, ABMP could request board recognition for medical physicist working with remote afterloaders. The scope of any NRC recognition of a board's certification process will be reflected in the list of recognized boards to be maintained on the NRC website. Note that even without NRC board recognition covering teletherapy or GSUs, the ABMP-certified individual could still be an authorized medical physicist, if the licensee submits an amendment request which demonstrates that the individual meets the requirements in §35.51(b) for one or more types of therapy units, as applicable.

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 could 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 requirements that: (1) candidates complete one year of full-time radiation safety experience under the supervision of an individual identified as an RSO on a Commission or Agreement State license that authorizes similar types of medical uses, and (2) candidates obtain written certification, signed by a preceptor RSO, that the individual has satisfactorily completed the requirements in §35.50(b)(1) and 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).

If you have any further questions, please contact Dr. Robert Ayres or me at (301) 415-5746.

Sincerely,

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

cc: Michael Gillin, Ph.D
Charles W. Coffey, II, Ph D

Enclosures:

1. Reinstein Ltr, dtd 7/20/2000
2. Gillin E-mail, dtd 10/26/2000
3. Coffey Ltr, dtd 9/28/2001

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John W. N. Hickey, Chief
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cc: Michael Gillin, Ph.D
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