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To: Sam Jones <szj@nrc.gov>
Date: Thu, Oct 26, 2000 12:49 PM
Subject: Clarification Request

Sam Jones
Mail Stop 9C24
United States Nuclear Regulatory Commission
Washington, D.C. 20555
(szj@nrc.gov)

Oct. 25, 2000

Dear Mr. Jones,

Thank you for following up with me via telephone the other day. As I discussed with you, the purpose of my inquiry, which was made on behalf of the American Board of Medical Physics (ABMP), was to seek additional information on the letter sent in June by Donald A. Cool, Ph.D., Director, Division of Industrial and Medical Nuclear Safety, to Larry Reinstein, Ph.D., Chairman, American Board of Medical Physics. At a recent meeting of the ABMP, Dr. Cool's letter was discussed and Dr. Reinstein requested that I seek additional information.

The second paragraph of the letter requesting that a letter be sent to Dr. Cool "listing each training and experience section of the rule for which you believe your Board's diplomates should be deemed to have met the requirements". The purview of the ABMP includes board certification in Medical Health Physics and Radiation Oncology Physics.

Upon reading 35.50, training for Radiation Safety Officer, it is my opinion that the current requirements of the ABMP meet the training and experience requirements. Thus, I do not believe that the ABMP has any questions pertaining to the training and experience of our candidates who take our Medical Health Physics examination.

Paragraph 35.51, training for an authorized medical physicist, lists the training and experience for an authorized medical physicist. Subparagraph (a) reads as follows "Is certified by a specialty board whose certification process includes all of the training and experience requirements in paragraph (b) of this section". Paragraph b contains educational requirements "and an additional year of full time work experience under the supervision of an individual who meets the requirements for an authorized medical physicist at a medical institution that includes the tasks listed in paragraphs 35.67, 35.433, 35.632, 35.633, 35.635, 35.642, 35.643, 35.645, and 35.652, as applicable".

Our question involves the use of the word "all" in paragraph (a) of 35.51, namely "all of the training and experience requirements". The phrase "as applicable" which appears in paragraph b may modify the all in paragraph a.

The tasks listed in paragraph b are as follows:

- 35.67 Requirements for possession of sealed sources and brachytherapy sources
- 35.433 Full calibration measurements on a teletherapy unit
- 35.632 Full calibration on remote afterloading units

35.635	Full calibration on gamma knives
35.642	Periodic spot checks on teletherapy units
35.643	Periodic spot checks on HDR
35.645	Periodic spot checks for gamma knives
35.652	Radiation surveys

As I mentioned in our phone conversation, there are only a limited number of gamma knives in the United States and thus only a limited opportunity for medical physicists to receive training on a gamma knife. It would be very helpful if you could clarify the goals of the NRC relative to this issue. (As a board certified physicist at an institution with a gamma knife, I received training on the gamma knife on site and again on site during installation.)

I can suggest several different interpretations of the above, namely:

Interpretation 1: Require all candidates to spend at least one day at a medical institution with a gamma knife as part of their additional year of work experience.

Interpretation 2: Inform the NRC that ABMP candidates meet all of the tasks listed in paragraph b except those in 35.635 and 35.645.

Interpretation 3: Require candidates to read about full calibration of gamma knives and periodic spot checks for gamma knives as part of their additional year of work experience.

Thank you for your help with this matter. It is my hope that the question is clear, although at times I am not sure that it is clear in my own mind.

Best Wishes,

Michael Gillin, Ph.D.
Professor, Radiation Oncology