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EDO CONTROL: G20030019

DOC DT: 01/13/03

FINAL REPLY:

William R. Hendee
American Board of Radiology

TO:

Chairman Meserve

FOR SIGNATURE OF :

** GRN **

CRC NO: 03-0020

DESC:

NRC Staff Options Paper Regarding Revisions to
10 CFR Part 35 that Could Impact NRC Recognition
of Various Professional Certification Boards

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SPECIAL INSTRUCTIONS OR REMARKS:

For Appropriate Action.

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Date Printed: Jan 14, 2003 10:33

PAPER NUMBER: LTR-03-0020
ACTION OFFICE: EDO

LOGGING DATE: 01/14/2003

AUTHOR: Phd William Hendee (ABR)
AFFILIATION: WI
ADDRESSEE: CHRM Richard Meserve

SUBJECT: Concerns NRC staff options paper concerning revisions to 10 CFR Part 35 that could impact
NRC recognition of various professional certification boards

ACTION: Appropriate
DISTRIBUTION: RF

LETTER DATE: 01/13/2003

ACKNOWLEDGED No

SPECIAL HANDLING: OCM #13064

NOTES:

FILE LOCATION: ADAMS

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Dear Dick:

Thank you for your letter of December 17, 2002 responding to my request of November 19, 2002 to make public the NRC staff options paper concerning revisions to 10 CFR Part 35 that could impact NRC recognition of various professional certification boards. I have reviewed the staff options paper in which three options are presented concerning qualifications to serve as a Radiation Safety Officer. Option 1 provides no recognition of certification boards. Option 2 proposes to recognize specific certification boards in the final regulations. Option 3 proposes to recognize those same certification boards by a listing on the NRC web site, but not in the final regulations.

The American Board of Radiology wishes to express its strong support for Option 2. We believe that the certification boards should be included in the final regulations in order to ensure permanence of their recognition. As a fallback position, the American Board of Radiology would not object to Option 3, although we believe it is a less desirable course of action. The American Board of Radiology finds Option 1 to be unacceptable and in conflict with the long-standing role of the certification boards to reflect, through their entrance requirements, the standards for education and training widely agreed upon by the professions.

However, in Options 2 and 3, certification in Medical Nuclear Physics by the American Board of Radiology currently is not included as a default pathway for authorization as a Radiation Safety Officer. The American Board of Radiology strongly objects to this omission. We have performed an itemized comparison of training and experience requirements for certification in Medical Nuclear Physics by the American Board of Radiology with those of the boards currently listed in options 2 and 3. These certifications are:

- American Board of Health Physics in Comprehensive Health Physics
- American Board of Medical Physics in Medical Health Physics
- American Board of Science in Nuclear Medicine in Radiation Protection.

This comparison reveals that the education and training requirements of the American Board of Radiology are at least as rigorous as, and in some cases more

rigorous than, those of the American Board of Medical Physics and the American Board of Science in Nuclear Medicine. The years of training and experience for entrance to certification by the American Board of Health Physics exceed those for any of the other boards, including the American Board of Radiology. However, none of this training or experience is required to be in the medical field.

Representatives of the American Board of Radiology wish to discuss our concerns with you, either by a telephone conference call, or, if you prefer, an on-site meeting. I will call you in a few days to determine your preference and to schedule the discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Hendee", written in a cursive style.

William R. Hendee, PhD
President
American Board of Radiology

WRH sd