

DOCKET NUMBER
PROPOSED RULE PR 35

10

(68FR 68549)

Dear Sirs:

The Iowa Department of Public Health (IDPH), Bureau of Radiological Health, would like to comment of Part 35 concerning training and specialty boards.

The regulatory community has approved the various specialty boards for Authorized User (AU) and Nuclear Pharmacists (NP) after reviewing their requirements, the assumption being it was a cooperative effort between the regulators and various boards. The previous requirements designated a minimum number of didactic hours in radiation safety for their candidates. As the new Part 35 stands now this designation does not exist. It states, "has completed 700 hours of training and experience ...", there is no breakdown between didactic and clinical training and experience.

As a regulator, I would like to see a preceptor statement being divided between didactic and clinical experience. The preceptor statement could state 700 hours of training and experience and the license reviewer would not know if the individual had any didactic training in radiation safety, radiation biology, measurement of radioactivity, and etc.

The IDPH agrees with David Walter from the State of Alabama that the regulatory agencies should specify a minimum number of didactic hours in radiation safety.

- 1) That for nuclear pharmacists under 35.55 and AU's under 35.390 a minimum of 200 hours of didactic training should be required (out of the total of 700 hours).
- 2) For those uses that do not require a written directive, but still require a total of 700 hours (i.e. 35.290), a suggestion of a minimum of 80 hours of didactic training be required.
- 3) For those uptake, dilution and excretion studies, which require 60 hours of total training (i.e. 35.190), recommend a minimum of 8 hours of didactic training.

IDPH would like the NRC to take these comments into consideration.

Sincerely,
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USNRC

February 5, 2004 (3:31PM)

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Template = SECY-067

SECY-02

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Date: 12/1/03 11:26AM
Subject: Comment on "10CFR Part 35"

Attached is commnet from the State of Iowa concerning the recognition of Professional Specialty Board Certification: <<Coment on Part 35.doc>>

Sincerely,
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Subject: Comment on "10CFR Part 35"
Creation Date: 12/1/03 11:26AM
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Size

283
20992
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Date & Time

12/01/03 11:26AM

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Expiration Date: None
Priority: Standard
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