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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

TO: Secretary to the NRC

FROM: Sheldon P. Kerner, AOCR President

DATE: February 20, 2004

RE: Medical Use of Byproduct Material—Recognition of Specialty Boards
RIN 3150-AH19

Thank you for the opportunity to submit comments.

Part 35.390 Training for use of unsealed byproduct material for which a written directive is required.

(a) (1) Reference is made to residency training in a radiation therapy or nuclear medicine training program or a program in a related medical specialty...

We recommend that residency training in "diagnostic radiology" be specifically stated as is radiation therapy and nuclear medicine.

Part 35.50 Training for Radiation Safety Officer.

(a) (2) Have 5 or more years of professional experience in health physics (graduate training may be substituted for no more than 2 years of the required experience) including at least 3 years in applied health physics; and

We suggest that "professional experience in health physics" and "...at least 3 years in applied health physics..." be defined. Our greatest concern is the intent of the term "...experience..." and the phrase "...in applied health physics...". If full-time experience is required in the dedicated practice of health physics to meet the definition, then most a radiologists will not be able to qualify to fill this position. This is a major concern.

Respectively submitted by:

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