

February 23, 2004

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PROPOSED RULE PR 35
(68FR 68549)

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USNRC

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Dear Sir or Madam:

February 24, 2004 (2:30PM)

I have the following comments with respect to *Preceptor Certification*.

OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

The current proposed rule requires a written certification that the individual has satisfactorily completed the required training and has achieved a level of knowledge or competency to function independently, and requires that the written certification be signed by a preceptor who is an RSO, AMP, ANP, or AU. I do not believe that this requirement is justified or necessary for the specialty board certification pathway for the following reasons and questions:

1. Specialty board certification requires letters of endorsement to verify the candidate's work experience and professional qualifications. This verification must come from a program director, or certified physicist or physician who practices in a medical specialty related to the candidate's field, and who has personal knowledge of the candidate's training, experience, and ethical standing. The candidate must also successfully complete a multi-part exam designed to determine his/her knowledge and fitness to practice in the particular medical specialty. Requiring these individuals to also submit a written preceptor certification is redundant.
2. For individuals pursuing the specialty board certification pathway, the preceptor must certify that the individual has satisfactorily completed the requirements for board certification. Unless the preceptor is involved in the specialty board certification process, they will only be able to verify the individual possesses a valid certificate. This certificate validation can be performed by anyone.
3. Some individuals certified by a specialty board may have been practicing for years under the supervision of an RSO, AMP, ANP, or AU, but may not be authorized under the license for that particular medical specialty. If the supervising RSO, AMP, ANP, or AU under that license were to become physically incapable of completing the preceptor certification, what recourse would the individual have to obtain authorization?
4. The preceptor certification for individuals who are board certified is a new requirement. What is the rationale or justification for this? Has there been an increase in the number of safety problems or violations with those individuals who are authorized through the board certification pathway?

Sincerely,

Michael Sheetz, MS, CHP, DABMP
University of Pittsburgh
Radiation Safety Office
G-7 Parran Hall
Pittsburgh, PA, 15261
412-624-2728 (phone)
412-624-3562 (fax)
sheetz@radsafe.pitt.edu

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