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Secretary, U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: RIN 3150-AH19

The following is a submitted comment from the Nuclear Medicine Residency Review Committee of the Accreditation Council for Graduate Medical Education (ACGME).

There are currently 64 ACGME-approved Nuclear Medicine training program with 151 residents. These program are reviewed at least every 5 years by the Nuclear Medicine Residency Review Committee. These training programs offer the most complete training in the diagnostic and therapeutic use of unsealed sources available to physician trainees in the United States. We are concerned that some of the changes in Part 35 will inappropriately hinder their ability to obtain appropriate employment and practice optimal nuclear medicine. It may also adversely affect both the quality of patient care and the access to patient care.

We are particularly concerned regarding the proposed requirement for three years of residency training (specified in proposed new 35.390). Although it may be appropriate for the NRC to define training requirements related to radiation safety, it is inappropriate for the NRC to codify training requirements related to the practice of medicine. The required length of training for a medical specialty should be determined by the ACGME and the specialty boards. For physicians not board certified in radiology, the current nuclear medicine training programs are two years duration preceded by at least one clinical year. The two-year programs have been completely sufficient to train physicians in the use of unsealed sources and provide the most rigorous such training available in the United States today.

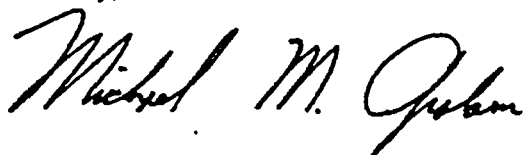
In an effort to comply more explicitly with the general training requirements in Part 35, both ABNM and ACGME are re-writing their requirements so that all three are consistent. Because of the inherent delays in the ACGME approval process, the new requirements will not be in place until some time after 2005.

In summary, the Nuclear Medicine RRC of the ACGME is requesting the following action from the NRC.

The NRC requirement for a three-year residency should be struck from § 35.390. Determination of the length of residencies is related to the practice of medicine and is outside of the expertise of the NRC.

Thank you for considering these comments and our requests.

Sincerely,



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