UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 28, 1999

Timothy M. Bateman, MD
President
American Society of Nuclear Cardiology
9111 Old Georgetown Road
Bethesda, MD 20814-2376

Dear Dr. Bateman:

I am responding to your letter, dated April 8, 1999, to Chairman Jackson, regarding proposed changes to the training and experience requirements that were presented by the Nuclear Regulatory Commission (NRC) Working Group on 10 CFR Part 35, "Medical Use of Byproduct Material," to the NRC's Advisory Committee on the Medical Uses of Isotopes on March 24-25, 1999.

As you are aware, the issue of training and experience has received the most comments during the rulemaking process to revise Part 35. Viewpoints on this issue have varied. The Commission has received comments both supporting reduction in requirements affecting personnel in the diagnostic area, including those from the American College of Cardiology and the American Society of Nuclear Cardiology, and favoring continuance of the existing requirements. In addition, the Commission has recently received numerous comments regarding whether training should be obtained in an Accreditation Council for Graduate Medical Education (ACGME) approved program.

NRC has discussed the proposed requirements with the medical community at numerous public meetings. The most recent of these meetings was with representatives of the medical boards involved in training, examining, and certifying individuals, on February 17-18, 1999. At that meeting, NRC staff presented alternatives for the most significant issues associated with training and experience and solicited additional information from the boards. The proposed training and experience requirements that were presented to the ACMUI at their March meeting were a result of both the public comments and the input received from these public meetings.

The NRC staff will be continuing to evaluate the public comments and refine the training and experience requirements until the draft final rule is forwarded to the Commission in July. Your comments on the training and experience requirements for diagnostic users of byproduct material will be taken into consideration during that process. In addition, a copy of your letter was placed in the docket file associated with this regulatory action.

Please note that we plan to place a "staff working version," of the draft final rule text, on the NRC rulemaking website during May so that interested individuals can monitor progress on the rulemaking. If you have any additional questions on the rulemaking, please contact Cathy Haney, of my staff, at (301) 415-6825.

Sincerely,

Donald A. Cool, Director
Division of Industrial and
Medical Nuclear Safety, NMSS

cc: Manuel Cerqueira, MD