

Commenters on proposed rule raised issue of a need for specifying a minimal number of hours of 'didactic' T&E – that is, classroom and laboratory training – for individuals to qualify as authorized nuclear pharmacists and authorized users for uses under 35.190, 35.290 (diagnostic nucl. med. and 35.390 (uses for which a WD is req.)

NRC formed a Steering Group, including a rep of OAS; WG, which included OAS and CRCPD reps, met during Summer.

WG considered several options, including administration of an exam to demonstrate knowledge of rad safety handling (discarded as not feasible due to logistics, long-time to implement).

Came up with option that was a solution that takes into account concerns of all stakeholders and implementation of the rule, a compromise that takes these issues into account and applies only to the alternate pathway. It reflects input from AS and ACMUI rec'd during Summer – specifying minimal number of hour of didactic T&E, for alternate pathway only and does not affect the certification pathway.

Safety: answers rhetorical question of: 'Is 1 hour of classroom and laboratory training sufficient?

Consistency – important to keep this in mind:

establishes a consistent standard from state to state

important to stakeholders on both sides of the regulatory 'fence:'

makes it easier for States to maintain compatibility category B status

Gives consistency wanted to those being regulated who desire consistent standards

Summarize total hours / minimum didactic

Recommendations for Minimum Number of Hours of Didactic Training					
Section	Didactic & Experience (hr)	Recommended Minimal Didactic Training (hr)			Subpart J
		Agreement States	ACMUI Subcommittee	Working Group <i>Alternate Pathway Only</i>	
35.55	700	200	zero; 25-33 %	200	–
35.190	60	8	zero; 25-33 %	8	40
35.290	700	80-100	zero; 25-33 %	80	200
35.390	700	200	zero; 25-33 %	200	80