

August 4, 2005

Dr. Michael Blend, D.O., PhD  
c/o AOBNM 4<sup>th</sup> Floor  
American Osteopathic Association  
142 East Ontario Street  
Chicago, IL 60611

Dear Dr. Blend:

I am writing in response to the July 5, 2005 letter from the American Osteopathic Board of Nuclear Medicine (AOBNM), signed by you, seeking recognition of its certification processes by the U.S. Nuclear Regulatory Commission (NRC). There are several statements in the letter which prelude recognition of AOBNM certification processes without further input from the AOBNM. The issues needing attention and revised responses are listed and explained below.

1. Page 1, paragraph 1 - The referenced rule sections are in Subpart J of 10 CFR 35 (which expires on October 25, 2005), not in Subparts B and D through H. AOBNM needs to indicate the conformity of its certification process(es) with the specifically-listed requirements in 10 CFR 35.290, and, if desired, 10 CFR 35.390.
2. Page 2, Section 1 - AOBNM needs to indicate for which of the listed certification processes (Nuclear Medicine, Nuclear Cardiology, Nuclear Imaging and Therapy, In Vitro and In Vivo Nuclear Medicine) it seeks NRC recognition. For those processes for which recognition is sought, AOBNM needs to verify that the processes require candidates for certification to meet the specific requirements listed in 10 CFR 35.290, and, if desired, 10 CFR 35.390.
3. Page 2, Section 1, Item c) under "For full certification in nuclear medicine" - AOBNM needs to confirm that under c), "other combinations of training and experience," candidates for certification must meet the specific requirements listed in 10 CFR 35.290, and, if desired, 10 CFR 35.390.
4. Page 3, paragraph 3 - AOBNM needs to update the reference to NRC regulations to reflect certification candidate conformity to the requirements in the 2005 current 10 CFR Part 35 sections 35.290, "Training for imaging and localization studies," and, if desired, 10 CFR 35.390, "Training for use of unsealed byproduct material for which a written directive is required."
5. Page 3, paragraph 3 - No reference to candidate conformity to the requirements in 10 CFR 35.50, "Training for Radiation Safety Officer," is needed, since NRC recognition of AOBNM certification processes is apparently not being sought for this section.
6. Pages 4 through 7 - Please indicate which of the examined areas listed as parts of the certification examination on radiation safety address, per the requirement in 10 CFR 35.290(a)(2), assess "knowledge and competence in radiation safety, radionuclide handling, and quality control." If appropriate to recognitions being sought, please indicate which of the examined areas listed as parts of the certification examination on radiation safety address, per the requirement in 10 CFR 35.390(a)(2), assess "knowledge and competence in radiation

safety, radionuclide handling, quality control, and clinical use of unsealed byproduct material for which written directive is required.”

Review of AOBNM’s application for recognition will continue upon receipt of AOBNM’s replies to the issues needing attention and revised responses that are listed and explained above.

Communications from the AOBNM associated with applying for recognition of one or more of its certification processes should continue to be addressed to:

U.S. Nuclear Regulatory Commission  
ATTN: Mr. Thomas Essig, Chief, Materials Safety  
and Inspection Branch (MS T8F3)  
11545 Rockville Pike  
Rockville, MD 20852

For further information or for questions, please contact Dr. Ronald Zelac of my staff (301/415-7635, rez@nrc.gov).

Sincerely,

**/RA/ Lydia W. Chang for**

Thomas H. Essig, Chief  
Materials Safety and Inspection Branch  
Division of Industrial and  
Medical Nuclear Safety  
Office of Nuclear Material Safety  
and Safeguards

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Thomas H. Essig, Chief  
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Division of Industrial and  
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Office of Nuclear Material Safety  
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