

September 9, 2005

Ms. Pamela A. Smith  
Executive Director  
American Osteopathic Board of Radiology  
119 East Second Street  
Milan, MO 63556-1331

Dear Ms. Smith:

I am writing in response to your July 26, 2005, letter in which you were seeking recognition of the American Osteopathic Board of Radiology's (AOBR) certification processes by the U.S. Nuclear Regulatory Commission (NRC). There are several statements in the letter which preclude recognition of AOBR certification processes without further input from the AOBR. The issues that require attention are listed and explained below.

1. Page 1, AOBR should update the list of requested specialties to exclude 10 CFR 35.100, 10 CFR 35.200, 10 CFR 35.396 and 10 CFR 35.491. Authorization by specialty board certification is not addressed in these sections of the regulations.
2. AOBR does not meet the board certification process for Radiation Safety Officer because 10 CFR 35.50 requires either professional experience in health physics or supervised experience in medical physics.

Please note, however, that in accordance with 10 CFR 35.50(c)(2), if a physician who holds certification from an NRC recognized board is identified on a license as an Authorized User, that physician may be eligible to be a Radiation Safety Officer based on their Authorized User status. Therefore, it is not necessary for medical specialty boards to apply for NRC recognition of its certification process for Radiation Safety Officer.

3. AOBR needs to confirm that candidates seeking certification for the following medical uses must meet the specific training and experience requirements listed in 10 CFR 35.190(a)(1), 35.290(a)(1), 35.390(a)(1), 35.392(c)(1) and (c)(2), 35.394(c)(1) and (c)(2), 35.490(a)(1), 35.590(b) and (c) and 35.690(a)(1).
  - uptake, dilution, and excretion studies (10 CFR 35.190)
  - imaging and localization studies (10 CFR 35.290)
  - use of unsealed byproduct material for which a written directive is required (10 CFR 35.390)
  - oral administration of sodium iodide I-131 requiring a written directive in quantities less than or equal to 1.22 Gigabecquerels (GBq), equivalent to 33 millicuries (mCi) (10 CFR 35.392)
  - oral administration of sodium iodide I-131 requiring a written directive in quantities greater than or equal to 1.22 GBq (33 mCi) (10 CFR 35.394)
  - use of manual brachytherapy sources (35.490)
  - use of sealed sources for diagnosis (35.590)

- use of remote afterloader units, teletherapy units, and gamma stereotactic radiosurgery units (10 CFR 35.690)
4. Page 3 - In accordance with 10 CFR 35.190(a)(2) and 35.290(a)(2), please indicate which of the examined areas listed as parts of the certification examination in Diagnostic Radiology under Physics of Medical Imaging, Biological Effects and Safety assess knowledge and competence in “radionuclide handling and quality control.”
  5. Pages 3 through 4 - In accordance with 10 CFR 35.390(a)(2), please indicate which of the examined areas listed as parts of the certification examination in Diagnostic Radiology and Radiation Oncology assess knowledge and competence in “radiation safety, radionuclide handling, quality assurance, and clinical use of unsealed byproduct material for which a written directive is required.”
  6. Page 4 - In accordance with 10 CFR 35.490(a)(2), please indicate which of the examined areas listed as parts of the certification examination in Radiation Oncology assess knowledge and competence in “radiation safety, radionuclide handling, treatment planning, quality assurance, and clinical use of manual brachytherapy.”
  7. Page 4 - In accordance with 10 CFR 35.690(a)(2), please indicate which of the examined areas listed as parts of the certification examination in Radiation Oncology assess knowledge and competence in “radiation safety, radionuclide handling, treatment planning, quality assurance, and clinical use of stereotactic radiosurgery, remote afterloaders and external beam therapy.”

Review of AOBR’s application for recognition will continue upon receipt of AOBR’s official reply to the issues needing attention that are listed and explained above.

Communications from the AOBR 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 H. Essig, Chief, Materials Safety  
and Inspection Branch (MS T8F3)  
11545 Rockville Pike  
Rockville, MD 20852

For further information or for questions, please contact Ms. Cindy Flannery of my staff at (301) 415-0223, cmf@nrc.gov.

**/RA/**

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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