

Dr. Bertin,

This e-mail is to confirm our discussion on October 3, 2005, of your September 23, 2005 letter to Tom Essig providing supplemental information to your August 18, 2005 original application for NRC recognition of the certification process of the Board of Pharmaceutical Specialties certification in nuclear pharmacy.

Your October letter was responsive to our request for additional clarification. We will be able to recommend recognition of your board and listing it on our web site once Mr. Essig receives an official response that indicates how long your board has met our requirements.

Your clarifications on examining "radiation safety" and foreign candidates are important in determining the date on which the board met NRC's criteria. We consider your response on the examination knowledge and proficiency in "radiation safety" a clarification of ongoing practices that were already in place. Your formal addition of the requirement to pass the Foreign Pharmacy Graduate Examination Committee (FPGEC) is considered a change in your program. However, you indicated that you have reviewed records of past candidates to see if they met the NRC requirements and they did. Therefore the addition of the passing of the Foreign Pharmacy Graduate Examination Committee (FPGEC) is seen as a codification of past practices.

The date you identify as the date the board met NRC' criteria could be the most recent of the following three dates: (1) when the examination domains you indicated include "radiation safety;" (2) the year that you identify a candidate that did not either graduate from a pharmacy program accredited by the American Council on Pharmaceutical Education (ACPE) or pass the Foreign Pharmacy Graduate Examination Committee (FPGEC); or the date that you required 4,000 hours of training/experience in nuclear pharmacy practice with academic training substituting for no more than 2,000 hours.

Communications should continue to be addressed to:

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