

**From:** Mohammad Saba — NMSS  
**To:** cerquem@ccf.org  
**Date:** 9/28/05 11:06AM  
**Subject:** Follow-up e-mail

Dr. Cerqueira:

This e-mail is to summarize our telephone conversation on September 22, 2005 regarding the CBNC's application for NRC recognition of CBNC's certification process under the requirements of 10 CFR 35.290. The NRC staff that participated in the meeting were Donna-Beth Howe, Cindy Flannery, Ron Zelac, and Mohammad Saba. There are several statements in the letters which preclude recognition of CBNC certification processes without further input from the CBNC. The issues that require attention are listed and explained below.

1. In the CBNC Training and/or Experience Eligibility Requirements 2006 (COCATS), second column, second paragraph states that your board requires a minimum of 80 hours of work experience in the topics listed in NRC's supervised work experience requirements (10 CFR 35.290(c)(1)(ii)). While NRC does not require a specialty board to provide a breakdown of how the required 700 hours of training and experience are divided between classroom & laboratory training and supervised work experience for the topics in the regulations, it appears by the way the COCATS is stated that a significant part of the 700 hours is spent in clinical areas not directly related to radiation safety. Please clarify how the CBNC assure all CBNC candidates meet the 700 hours of training and work experience in basic radionuclide handling techniques and radiation safety for the topics listed in 10 CFR 35.290(c)(1)(i) and 10 CFR 35.290(c)(1)(ii) and not just the 80 hours of radiation safety work experience in 10 CFR 35.290(c)(1)(ii) listed in COCATS.

2. During our telephone conversation you indicated that some candidates seeking certification by the CBNC receive their work experience outside the U.S. and that the CBNC issues certifications that distinguish the candidates that receive their work experience under the supervision of an authorized user from the candidates that receive their work experience outside the U.S. Please provide the method CBNC uses to distinguish candidates who have obtained their work experience under the supervision of an authorized user who meets the requirements in 10 CFR 35.290(c)(1)(ii).

3. In the CBNC Training and/or Experience Eligibility Requirements 2006 (COCATS), first column, fifth paragraph, classroom and laboratory training requirements shall include **instrumentation** (this issue was discussed in our previous telephone conversations).

4. You need to indicate when the CBNC certification program will meet (or has met) the requirements in 35.290(a). In responding to the above issues you should distinguish between clarifications provided to better explain the existing program and new changes that have to be made to your certification process to meet the requirements in 35.290(a).

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

Official communications from the CBNC associated with applying for recognition 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)  
1545 Rockville Pike  
Rockville, MD 20852

If I have not accurately captured the issues discussed or you have any questions, please feel free to

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contact me at (301) 415-7608, [mss@nrc.gov](mailto:mss@nrc.gov).

Mohammad Saba

CC: [edgerton@cbnc.org](mailto:edgerton@cbnc.org)