

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

**From:** Steven A. Leibel, M.D.  
President  
American Board of Radiology

**Date:** October 14, 2005

**Re:** Request for Recognized Status for the American Board of Radiology (ABR) in  
Radiation Oncology

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*Dear Mr. Essig:*

*I am writing in response to the email from Cynthia Flannery, CHP dated September 9, 2005 where further input was needed from the ABR in connection with the letter to you dated August 10, 2005 and the US Nuclear Regulatory Commission's recognition of ABR certification processes. The issues that required attention are listed and explained below.*

1. ABR may consider excluding 10 CFR 35.394 from the list of requested specialties. Diplomates may be eligible for oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 Gigabecquerels (GBq), equivalent to 33 millicuries (mCi) under 10 CFR 35.394 (when additional training requirements are met) if the Certification Board is recognized under 10 CFR 35.390.

For example, if a physician, who holds certification from an NRC recognized board, is identified on a license as an Authorized User for 10 CFR 35.390 materials (unsealed byproduct material for which a written directive is required), that physician may be eligible to be authorized for 10 CFR 35.394 materials by meeting the additional training requirements in 10 CFR 35.394(c)(1) and (c)(2). Therefore, it is not necessary for medical specialty boards to apply for NRC recognition of its certification process for 10 CFR 35.394 materials if that specialty board is applying for the certification process under 10 CFR 35.390.

#### **RO Response**

The ABR will exclude 10 CFR 35.394 from the list of requested specialties. The ABR has applied for NRC recognition of its certification process under 10 CFR 35.390 (unsealed byproduct material for which a written directive is required). Candidates for ABR certification will meet the case experience requirements described in 10 CFR 35.394(c)(2) (authorized user for the oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 Gigabecquerels (33 millicuries)).

2. ABR may consider excluding 10 CFR 35.396 from the list of requested specialties since authorization by specialty board certification is not addressed in this section of the regulations. Diplomates may be eligible for parenteral administrations of unsealed byproduct material requiring a written directive under 10 CFR 35.396 (when additional training requirements are met) if the Certification Board is recognized under 10 CFR 35.490 or 10 CFR 35.690.

For example, if a physician, who holds certification from an NRC recognized board, is identified on a license as an Authorized User for 10 CFR 35.490 (manual brachytherapy) or 10 CFR 35.690 (remote afterloader units, teletherapy and gamma stereotactic radiosurgery units) materials, that physician may be eligible to be authorized for 10 CFR 35.396 materials by meeting the additional training requirements in 10 CFR 35.396(d). Therefore, it is not necessary for medical specialty boards to apply for NRC recognition of its certification process for 10 CFR 35.396 materials if that specialty board is applying for the certification process under 10 CFR 35.490 or 10 CFR 35.690.

**RO Response**

The ABR will exclude 10 CFR 35.396 from the list of requested specialties. The ABR has requested NRC recognition of its certification in Radiation Oncology under 10 CFR 35.490 and 10 CFR 35.690. Candidates will be eligible to be authorized for 10 CFR 35.396 by meeting the additional training requirements described in 10 CFR 35.396(d).

3. ABR needs to confirm that candidates seeking certification for radiation oncology must meet the specific training and experience requirements described in 10 CFR 35.390(b)(1)(I) through 10 CFR 35.390(b)(1)(ii)(E) for use of unsealed byproduct material for which a written directive is required.

**RO Response**

The ABR confirms that candidates seeking certification for Radiation Oncology must meet the specific training and experience requirements described in 10 CFR 35.390(b)(1)(I) through 10 CFR 35.390(b)(1)(ii)(E) for the use of unsealed byproduct material for which a written directive is required.

4. ABR needs to confirm that candidates seeking certification for radiation oncology must obtain their work experience under the supervision of an authorized user who meets the requirements in 10 CFR 35.390(b)(1)(ii).

**RO Response**

The ABR confirms that candidates seeking certification for radiation oncology must obtain their work experience under the supervision of an authorized user who meets the requirements of 10 CFR 35.390(b)(1)(ii).

5. In accordance with 10 CFR 35.390(a)(2), ABR needs to confirm that the certification examination in radiation oncology also assesses knowledge and competence in clinical use of unsealed byproduct material "for which a written directive is required."

**RO Response**

The ABR confirms that, in accordance with 10 CFR 35.390(a)(2), the certification examination in Radiation Oncology assesses knowledge and competence in the clinical use of unsealed byproduct material for which a written directive is required.