

From: Cynthia Flannery
To: rhattry@theabr.org
Date: 11/21/05 4:16PM
Subject: Response to Oct. 14 letter

Dear Dr. Hattery:

I am writing in response to your October 14, 2005 letters in which you were seeking recognition of the American Board of Radiology's (ABR) Diagnostic Radiology, Radiation Oncology and Radiologic Physics certification processes by the U.S. Nuclear Regulatory Commission (NRC). There are several statements in the letters which preclude recognition of ABR certification processes without further input from the ABR. The issues that require attention are listed and explained below.

Diagnostic Radiology:

1. The ABR-provided responses to no. 1 are OK, but it does not comport with information posted on the ABR web site. The response indicates that candidates seeking certification for diagnostic radiology must meet the specific training and experience requirements described in 10 CFR 35.290(c)(1)(i) and (c)(1)(ii) and 10 CFR 35.392(c)(1) and (c)(2), but the web site information on training and experience does not list the required topics. If the provided answer is correct, the web site information needs to be revised to include that the residency program must include the topics listed in 10 CFR 35.290(c)(1)(i) and (c)(1)(ii) and 10 CFR 35.392(c)(1) and (c)(2).

An ABR-supplied copy of referenced ABR web site information is needed.

2. The ABR web site indicates that the residency must include a 16 week rotation in clinical nuclear medicine and that didactic instruction will be required to cover the nuclear medicine topics cited in sections 35.290 (imaging and localization studies) and 35.392 (oral administration of I-131 in quantities less than or equal to 33mCi). The web site further states that this instruction can be given in classroom/laboratory sessions during the clinical rotations in nuclear medicine, or at other times during the residency. First, a 16 week rotation in clinical nuclear medicine may not provide 700 hours of training and experience. Second, it appears by the way the web site is stated, that a significant part of the 700 hours is spent in clinical areas not directly related to basic radionuclide handling techniques and radiation safety (e.g., interpretation of the films and images). Considering the fact that residents may spend a significant portion of this rotation on subjects not related to basic radionuclide handling techniques and radiation safety applicable to the topics listed in 10 CFR 35.290(c)(1)(i) and (c)(1)(ii) and 10 CFR 35.392(c)(1) and (c)(2), please clarify how the ABR can ensure that all ABR candidates meet the 700 hours of training and work experience in radiation safety in nuclear medicine.

3. The ABR-provided responses to the no. 2 are OK, but it does not comport with information posted on the ABR web site. The response indicates that candidates seeking certification for diagnostic radiology must obtain their work experience under the supervision of an authorized user who meets the requirements in 10 CFR 35.290(c)(1)(ii) and 10 CFR 35.392(c)(2), but the web site information does not mention this requirement. If the provided answer is correct, the web site information needs to be revised.

Here, too, an ABR-supplied copy of referenced ABR web site information is needed.

4. The ABR website indicates that ABR accepts candidates from Canadian residency programs. Please provide the method that ABR uses to distinguish candidates that meet the requirements in 10 CFR 35.290(c)(1)(ii) and 10 CFR 35.392(c)(2) (i.e., obtained work experience under the supervision of an authorized user) from those candidates who do not (i.e., obtained work experience in Canada).

5. The ABR-provided responses to the no. 3 are OK, but it does not comport with information posted on the ABR web site. The response indicates that the certification exam in diagnostic radiology includes assessment of knowledge and competence in radiation safety,

radionuclide handling and quality control, but the web site information on examinations does not explicitly list these anywhere. If the provided answer is correct, the web site information needs to be revised.

Here, too, an ABR-supplied copy of referenced ABR web site information is needed.

Radiation Oncology:

1. The ABR-provided responses to nos. 1 and 2 are OK.

2. For no. 3, the ABR-provided response indicates 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, but the web site information on training and experience does not mention the minimum number of hours or the required topics. If the provided answer is correct, the web site information needs to be revised to include that the residency program must include the minimum number of hours of training and experience (i.e., 700 hours) in the topics listed in 10 CFR 35.390(b)(1)(i)(A) through 10 CFR 35.390(b)(1)(ii)(E).

An ABR-supplied copy of referenced ABR web site information is needed.

3. For no. 4, the ABR-provided response indicates 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), but the web site information does not mention this requirement. If the provided answer is correct, the web site information needs to be revised.

Here, too, an ABR-supplied copy of referenced ABR web site information is needed.

4. The ABR website indicates that ABR accepts candidates from Canadian residency programs. Please clarify how ABR will distinguish all of the candidates that meet the requirements in 10 CFR 35.390(b)(1)(ii) (i.e., obtained work experience under the supervision of an authorized user) from those candidates who do not (i.e., obtained work experience in Canada).

5. For no. 5, the ABR-provided response indicates that 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. The ABR-provided response to this question is OK, but an ABR-supplied copy of referenced ABR web site information is needed that includes the required exam topics (i.e., radiation safety, radionuclide handling, quality assurance, treatment planning, and clinical use of the following: unsealed byproduct material for which a written directive is required; manual brachytherapy; stereotactic radiosurgery; remote afterloaders; and external beam therapy). Of the listed required exam topics, only radiation safety, radionuclide handling, and quality assurance could be found on the website.

Radiologic Physics:

1. The ABR-provided responses to 4 of your 7 questions are OK. All that is needed for nos. 1, 2, 3, & 6 is an ABR-supplied copy of referenced ABR web site information.

2. The ABR-provided responses to the other 3 of your 7 questions are OK, but do not comport with information posted on the ABR web site.

a) For nos. 4 & 5, the ABR-provided response indicates that the preceptor must be an ABR-certified medical physicist, but the web site information permits the preceptor to be an ABR-certified physician. If the provided answer is correct, the web site information needs to be revised.

b) For no. 7, the ABR-provided response indicates that the certification exam in Therapeutic Radiologic Physics includes stereotactic radiosurgery, but the web site information on examinations does not mention stereotactic radiosurgery anywhere. If the provided answer is correct, the web site information needs to be revised.

Here, too, an ABR-supplied copy of referenced ABR web site information is needed.

In summary, with a few small adjustments to web-posted information, to comport with answers provided, and provision to NRC of the referenced web-posted information, the ABR application for its radiological physics certification program appears to be approvable.

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

Communications from the ABR 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 me at (301)
415-0223, cmf@nrc.gov.

Respectfully,
Cindy Flannery

Cindy Flannery, CHP, Team Leader
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CC: Donna-Beth Howe; Dr. Stephen R. Thomas; Mohammad Saba; Rebecca Karas; Ronald Zelac; Steven Leibel; Philip O. MD Alderson; Thomas Essig

Mail Envelope Properties (4382391A.455 : 17 : 35798)

Subject: Response to Oct. 14 letter
Creation Date: 11/21/05 4:16PM
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Options
Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification:
Send Mail Receipt when Opened

Concealed Subject: No
Security: Standard