

# NCS

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NUCLEAR CARDIOLOGY SYSTEMS  
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MS16  
J-6

10 February, 2006

Mr. Dennis Lawyer  
US Nuclear Regulatory Commission  
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REGION 1

Dear Mr. Lawyer

Background;

The Institute for Nuclear Medical Education (INME) has been providing the training and experience for physicians, radiation safety professionals and pharmacists, for over 20 years. The program has been reviewed by the American Council on Education and determined to be at the baccalaureate or graduate degree level for College/Universities Credit.

In this program, in the Radiopharmaceutical Chemistry section of the program, the participants may "earn" three semester hours of baccalaureate or graduate degree credit in Radiopharmaceutical Chemistry. In this section, the students gain experience in elution of a <sup>99</sup>mo-<sup>99m</sup>Tc generators from the construction of the generator, the chemistry of the process and elution. The students also gain experience in the procedure and calculations for assay of the eluate, assay for <sup>99</sup>Mo and Alumina.

The individuals demonstrating and supervising this learning experience are certified by the Department of Higher Education to instruct in this topic area. One individual is a licensed/authorized user Radiopharmacist. The other individual is a physicist who is an RSO on both NRC and Agreement State licenses. The entire program is recognized by the NRC and all Agreement States as providing the required training and experience in the Basics of Radioisotope Handling sufficient for that component of licensing requirements. The documentation of the INME educational experience is attested by the INME director.

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NMCC/RCM MATERIALS-002

FAX RECEIVED 2/10/2006

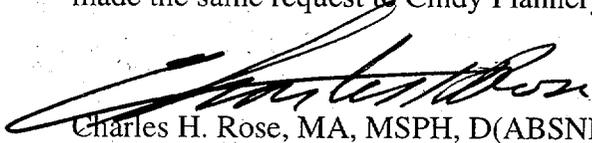
INME Position;

INME is taking the position that the very extensive, organized, and approved training in radiopharmaceuticals that includes extensive experience in the theory, components, chemistry, operation elution, testing and all related aspects of the generator received by participants in the INME program and successful completion of a comprehensive closed book examination over this and other topics, constitutes adequate training as stipulated in 35.290 (ii)(G).

INME further takes the position that the INME administration, after review of the educational experience and determination of successful completion of the formal examination, is authorized to certify this portion of the training.

Response Required;

A response as to the NRC accepting the position stated here in is formally requested. If you have questions or require clarification, please feel free to call. The AANC has made the same request to Cindy Flannery.



Charles H. Rose, MA, MSPH, D(ABSNM)  
President

P.S. The INME participants also gain experience with a  $^{137}\text{Cs}/\text{Ba}$  generator and are instructed about the positron generator and other potential/past generator systems.