

**From:** Cynthia Flannery  
**To:** AOCR-Pam Smith  
**Date:** 3/8/06 12:20PM  
**Subject:** Re: Request for NRC recognition of AOBR

Dear Ms. Smith:

I am writing in response to your January 25, 2006 letter and as a follow up to our telephone conversations on March 7 & 8, 2006 in which you were seeking recognition of the American Osteopathic Board of Radiology's (AOBR) certification processes by the U.S. Nuclear Regulatory Commission (NRC). There are several statements in the letter which preclude recognition of AOBR certification processes without further input from the AOBR. The issues that require attention are explained below.

1. The referenced AOBR web site information on the training and experience for 10 CFR 35.190 and 10 CFR 35.290 provides the clarification that NRC requested.
2. The certification process for the Diagnostic Radiology specialty does not meet the training and experience criteria of 10 CFR 35.390 because the residency training is not a radiation therapy or a nuclear medicine training program. Therefore, NRC will not be able to recognize AOBR's Diagnostic Radiology certification process for 10 CFR 35.390. The website information will need to be revised accordingly.
3. The AOBR responses to item nos. 2 and 3 on the training and experience for 10 CFR 35.390 for the Radiation Oncology specialty requires further clarification. The Clinical Components section of the "Basic Standards for Residency Training in Radiation Oncology" document submitted with AOBR's January 25, 2006 letter does not indicate a rotation requirement (for a minimum of 700 hours or 4 months) in a medical discipline that uses unsealed byproduct material requiring a written directive. Please clarify how the AOBR verifies that all Radiation Oncology candidates meet the 700 hours of training and experience requirements described in 10 CFR 35.390(b)(1)(i) through (b)(1)(ii)(E).

Further, the AOBR does not need to require their candidates to demonstrate case experience in the four categories of 10 CFR 35.390(b)(1)(ii)(G). If the AOBR wishes to seek NRC recognition of its certification process in Radiation Oncology for 10 CFR 35.390, please provide clarification on AOBR's letter dated January 25, 2006 regarding the case experience in 10 CFR 35.390 for AOBR's Radiation Oncology candidates and provide a copy of the referenced AOBR web site information.

4. The AOBR responses to item no. 4 on the Diagnostic Radiology residency program meeting the 700 hours of training and experience in a 16 week rotation provides the clarification that NRC requested.
5. The AOBR responses to item no. 5 and the referenced AOBR web site information on the training and experience for 10 CFR 35.392 for the Diagnostic Radiology specialty provides the clarification that NRC requested.

The AOBR responses to item no. 5 on the training and experience for 10 CFR 35.394 for the Diagnostic Radiology specialty requires further clarification. Please clarify how the AOBR verifies that all Diagnostic Radiology candidates can meet the case experience in 10 CFR 35.394(c)(2)(vi).

6. The AOBR responses to item no. 5 on the training and experience for candidates of 10 CFR 35.392 and 35.394 for the Radiation Oncology specialty requires further clarification. The Clinical Components section of the "Basic Standards for Residency Training in Radiation Oncology" document submitted with AOBR's January 25, 2006 letter does not indicate a rotation requirement (for a minimum of 80 hours) in a medical discipline (i.e., nuclear medicine) that uses sodium iodide I-131 requiring a written directive. Please clarify how the AOBR verifies that all Radiation Oncology candidates meet the training and experience requirements described in 10 CFR 35.392(c)(1) and(c)(2), and 35.394(c)(1) and(c)(2).

Please note, that there is an alternative for radiation oncologists seeking authorized user status for administration of unsealed byproduct material requiring a written directive, such as sodium iodide

I-131. Although authorization by specialty board certification is not addressed in 10 CFR 35.396, 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 specialty board is recognized under 10 CFR 35.490 or 10 CFR 35.690.

7. The AOBR responses to item no. 6 on the training and experience for 10 CFR 35.590 for the Diagnostic Radiology and Radiation Oncology specialties requires further clarification. Please clarify how the AOBR can ensure that all Diagnostic Radiology and Radiation Oncology candidates can meet the requirements in 10 CFR 35.590(b) and (c).

8. The AOBR responses to item no. 7 on the training and experience for 10 CFR 35.490 and 35.690 for the Radiation Oncology specialty requires further clarification. Please clarify what AOBR requires of their programs, 3 year residency in radiation oncology or 3 years of supervised clinical experience in radiation oncology under an authorized user.

9. The AOBR responses to item no. 7 and the website information on the training and experience requirements for 10 CFR 35.490 and 35.690 references the Program and Trainee Review Committee of the American Osteopathic Association as an approving body. Please describe the difference between the Post-Graduate Training of the American Osteopathic Association referenced in 10 CFR 35.390(a)(1) and the Program and Trainee Review Committee of the American Osteopathic Association referenced in item no. 7 of AOBR's January 25, 2006 letter.

10. The AOBR responses to item no. 8 and the referenced AOBR web site information on the exam topics for the Diagnostic Radiology specialty provides the clarification that NRC requested.

11. If the AOBR wishes to seek NRC recognition of its certification process in Radiation Oncology for 10 CFR 35.390, the AOBR responses to item no. 8 and the referenced AOBR web site information on the exam topics for the Radiation Oncology specialty requires further clarification. If the AOBR wishes to seek NRC recognition of its certification process in Radiation Oncology for 10 CFR 35.390, please indicate which of the examined areas listed as part of the certification examination in Radiation Oncology assess knowledge and competence in the clinical use of unsealed byproduct material for which a written directive is required.

12. The AOBR responses to item no. 10 on removing the attestation requirements provides the clarification that NRC requested.

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

Communications from the AOBR 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](mailto:cmf@nrc.gov).

Respectfully,  
Cindy Flannery

Cindy Flannery, CHP, Team Leader

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>>> "AOBR-Pam Smith" <[aocrps@nemr.net](mailto:aocrps@nemr.net)> 01/30/06 3:39 PM >>>  
Attached is the response of the American Osteopathic Board of Radiology to your letter of October 19, 2005. Reference in the letter is made to the Basic Standards for Residency Training in Diagnostic Radiology and the Basic Standards for Residency Training in Radiation Oncology. These standards and the AOB website's reference to candidates' required training and experience in nuclear medicine may be accessed by clicking on the following:

Diagnostic Radiology:

[http://www.aocr.org/certification/diagnostic\\_radiology.html](http://www.aocr.org/certification/diagnostic_radiology.html)

Radiation Oncology

[http://www.aocr.org/certification/radiation\\_oncology.html](http://www.aocr.org/certification/radiation_oncology.html)

I have also sent a copy of our response and enclosures by mail today. Please do not hesitate to contact me if further information is required.

Pamela A. Smith, Executive Director  
American Osteopathic College of Radiology  
119 East Second Street  
Milan, MO 63556  
800-258-2627

**Mail Envelope Properties (440F1253.806 : 17 : 35798)**

**Subject:** Re: Request for NRC recognition of AOBR  
**Creation Date:** 3/8/06 12:20PM  
**From:** Cynthia Flannery  
**Created By:** CMF@nrc.gov

**Recipients**

nemr.net  
aocrps (AOCR-Pam Smith)

**Post Office****Route**

nemr.net

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	13664	03/08/06 12:20PM

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