

June 23, 2006

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

Dear Mr. Essig

I am writing in response to an e-mail dated May 16, 2006, from Cynthia Flannery, requesting further input from the American Osteopathic Board of Radiology (AOBR) regarding its application seeking recognition of its certification processes by the U.S. Nuclear Regulatory Commission (NRC).

The AOBR has verified with all osteopathic residency training programs in Diagnostic Radiology, by a written Attestation Form, that each program has offered the training and experience described in the NRC guidelines, 10 CFR 35.290(a)(1) and (a)(2), and 10 CFR 35.392(a) since July 1, 2000. Therefore, the AOBR is requesting the date of recognition of Certification in Diagnostic Radiology to be July 1, 2000.

In regard to Radiation Oncology, the AOBR is requiring all examination candidates to submit a written attestation, verified by the program director, that the candidate has satisfactorily completed the training and experience as described in 10 CFR 35.390, CFR 35.490, and CFR 35.690. Therefore, the AOBR is requesting the date of recognition of Certification in Radiation Oncology to be May 1, 2007.

Also as requested, attached is the corrected copy of the nuclear medicine requirements of training and experience for Diagnostic Radiology candidates as stated on our website.

Thank you for the opportunity to submit this additional information in support of AOBR's application for recognition by the Nuclear Regulatory Commission. Please do not hesitate to contact me if additional information is required.

Sincerely



Pamela A. Smith
Executive Director

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cc Mark S. Finkelstein, DO, Chair
Dennis P. Vollman, DO, Vice Chair
Roy M. Teng, DO, Secretary-Treasurer
Paul J. Chase, DO, Nuclear Medicine Section Chair
Thomas M. Anderson, DO, Radiation Oncology Section Chair

Candidates seeking certification in Diagnostic Radiology from the American Osteopathic Board of Radiology must have completed the training and experience requirements for NRC licensure as stated below:

Training for imaging and localization studies (10 CFR 35.290 (a)(1) and (a)(2))

- I. Successfully complete a minimum of 4 years of residency training in a diagnostic radiology program approved by the Program and Trainee Review Committee of the American Osteopathic Association. The residency training program must include 700 hours of training and experience in basic radionuclide handling techniques and radiation safety applicable to the medical use of unsealed byproduct material for imaging and localization studies that includes the topics listed in (10 CFR 35.290 (c)(1)(i) and (c)(1)(ii)) and defined as follows:
 - A. Complete 700 hours of training and experience, including a minimum of 80 hours of classroom and laboratory training, in basic radionuclide handling techniques applicable to the medical use of unsealed byproduct material for imaging and localization studies. The training and experience must include, at a minimum:
 1. Classroom and laboratory training in the following areas:
 - a) Radiation physics and instrumentation
 - b) Radiation protection
 - c) Mathematics pertaining to the use and measurement of radioactivity
 - d) Chemistry of byproduct material for medical use
 - e) Radiation biology
 2. Work experience, under the supervision of an authorized user, who meets the requirements in 35.290, or 35.290(c)(1)(ii)(G) and 35.390, or equivalent Agreement State requirements, involving -
 - a) Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys
 - b) Performing quality control procedures on instruments used to determine the activity of dosages and performing checks for proper operation of survey meters
 - c) Calculating, measuring and safely preparing patient or human research subject dosages
 - d) Using administrative controls to prevent a medical event involving the use of unsealed byproduct material
 - e) Using procedures to safely contain spilled radioactive material and using proper decontamination procedures
 - f) Administering dosages of radioactive drugs to patients or human research subjects; and
 - g) Eluting generator systems appropriate for preparation of radioactive drugs for imaging and localization studies, measuring and testing the eluate for radionuclidic purity, and processing the eluate with reagent kits to prepare labeled radioactive drugs
- II. Pass an examination, administered by the AOBR, which assesses knowledge and competence in radiation safety, radionuclide handling and quality control.

Training for oral administration of sodium iodide I-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries) (10 CFR 35.392 (a))

- I. Successfully complete a minimum of 4 years of residency training in a diagnostic radiology program approved by the Program and Trainee Review committee of the American Osteopathic Association. The residency training program must include the training and work experience described in 10 CFR 35.392 (c)(1) and (c)(2) and defined as follows:
 - A. Has successfully completed eighty (80) hours of classroom and laboratory training, applicable to the medical use of sodium iodide I-131 for procedures requiring a written directive. The training must include:
 1. Radiation physics and instrumentation
 2. Radiation protection
 3. Mathematics pertaining to the use and measurement of radioactivity
 4. Chemistry of byproduct material for medical use
 5. Radiation biology; and
 - B. Work experience, under the supervision of an authorized user, who meets the requirements in 35.390(a), 35.390(b), 35.392, 35.394, or equivalent Agreement State requirements. A supervising authorized user, who meets the requirements in 35.390(b) must also have experience in administering dosages as specified in 35.390(b)(1)(ii)(G)(1) or (2). The work experience must involve -
 1. Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys
 2. Performing quality control procedures on instruments used to determine the activity of dosages and performing checks for proper operation of survey meters
 3. Calculating, measuring and safely preparing patient or human research subject dosages
 4. Using administrative controls to prevent a medical event involving the use of byproduct material
 5. Using procedures to contain spilled byproduct material safely and using proper decontamination procedures
 6. Administering dosages to patients or human research subjects, that includes at least three (3) cases involving the oral administration of less than or equal to 1.22 gigabecquerels (33 millicuries) of sodium iodide I-131.
- II. Pass an examination, administered by the AOBR, which assesses knowledge and competence in radiation safety, radionuclide handling and quality control.

Examination Content - The Diagnostic Radiology certification examination will assess knowledge and competence in the following areas:

- Radiological Physics (radiation production and interaction with matter)
- Radiation Biology (health effects)
- Radiation Safety and Protection
- Nuclear Medicine
- Radionuclide Handling
- Quality Control
- Clinical use of unsealed byproduct material for which a written directive is required