SECY - Fwd: Re: PRM-35-20

PRM-35-20 (71FR64168)

Page 1

DOCKETED USNRC

January 9, 2007 (2:15pm)

OFFICE OF SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

>>> "Lynne Fairobent" <lynne@aapm.org> 01/09/2007 10:58 AM >>>

Tue, Jan 9, 2007 1:47 PM

Fwd: Re: PRM-35-20

Alan:

From:

Date:

Subject:

To:

The AAPM petition only referred to the primary certifying boards for medical physicists. However, the wording in the following section if granted would include ABHP. ABHP is one of the boards that was listed in Subpart J. We have worked very closely with the ABHP and HPS and AAHP and the HPS has filed comments supporting our petition.

If you have additional questions, please let me know.

Betty Golden

SECY

Lynne

"By regulation, licensees can have only one individual named as a RSO, unlike the position of AU for which there are typically multiple individuals named on a license. This circumstance makes it far more difficult for an AMP or other Board diplomates to have acquired the requisite grandfather status prior to October 24, 2005. Radiation safety and training has been part of the certification exams for physicists for both the ABR (since at least 1979) and the ABMP (since inception of the exam). AAPM believes that the NRC should recognize individuals that were certified by a board that was listed in Subpart J of the old regulations for both §§ 35.50 (RSO) and 35.51 (AMP) prior to October 24, 2005.

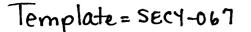
5. CONCLUSION

AAPM believes that these proposed solutions should be expedited. Although the certifying bodies are concerned with receiving recognized status, AAPM is concerned about ensuring that the diplomates of the Boards listed in Subpart J are able to continue practicing medical physics and serving as RSOs to assure the continuation of high quality patient care. AAPM believes that the proposed amendment to 10 CFR § 35.57, Training for experienced Radiation Safety Officer, teletherapy or medical physicist, authorized medical physicist, authorized user, nuclear pharmacist, and authorized nuclear pharmacist, should be enacted expeditiously to ensure that diplomates of the Boards listed in Subpart J are able to continue practicing medical physics and serving as RSOs in order to assure the continuation of high quality patient care. Further, AAPM believes that this action eliminates the marginalization of specialty boards."

Lynne A. Fairobent Legislative and Regulatory Affairs Manager AAPM One Physics Ellipse, College Park, MD 20740-3846 phone: 301-209-3364 fax: 301-209-0862 email: lynne@aapm.org

>>> "Jackson, Alan (RSO)" <<u>AlanJ@rad.hfh.edu</u>> 1/9/2007 10:41 AM >>>

Michael T. Lesar, I read the Receipt of Petition for Rulemaking [Docket No. PRM-35-20] by E. Russell Ritenour, Ph.D.; and had a comment. That is, other who previous received certification should also be grandfathered. In particular, Certified Health Physicists should have been included in the request (Diplomates of the American Board of Health Physicists).Thanks!-AlanAlan M. Jackson, MS, CHPRadiation Safety OfficeHenry Ford HospitalDetroit, MI 48202(313) 916-2739 Voice(313) 916-7329



FaxE-mail: <u>AlanJ@rad.hfh.edu</u>

CONFIDENTIALITY NOTICE: This email contains information from the sender that may be CONFIDENTIAL, LEGALLY PRIVILEGED, PROPRIETARY or otherwise protected from disclosure. This email is intended for use only by the person or entity to whom it is addressed. If you are not the intended recipient, any use, disclosure, copying, distribution, printing, or any action taken in reliance on the contents of this email, is strictly prohibited. If you received this email in error, please contact the sending party by replying in an email to the sender, delete the email from your computer system and shred any paper copies of the email you printed.

Note to Patients: There are a number of risks you should consider before using e-mail to communicate with us. These risks are described in our Privacy Policy at <u>http://henryford.com</u>. Review that policy carefully before continuing to communicate with us by e-mail. For greater Internet security, our policy describes the Henry Ford MyHealth electronic communication process - you may register at <u>http://henryford.com</u>. If you do not believe that our policy gives you the privacy and security protection you need, do not send e-mail or Internet communications to us.

emp\GW}00001.TMP

Page 1

Mail Envelope Properties (45A3E339.734 : 2 : 12150)

Subject:Fwd: Re: PRM-35-20Creation DateTue, Jan 9, 2007 1:47 PMFrom:Betty Golden

Created By: <u>BKG2@nrc.gov</u>

Recipients

nrc.gov TWGWPO02.HQGWDO01 SECY (SECY)

Post Office

TWGWPO02.HQGWDO01

Files	· · ·	Size
MESSAGE		6127
TEXT.htm	· .	8848

Date & Time Tuesday, January 9, 2007 1:47 PM

Route

nrc.gov

Phone
Expiration Date:
Priority:

Ontions

Priority:	Standard
ReplyRequested:	No
Return Notification:	None
Conserve and a Construct	` NT

Concealed Subject:NoSecurity:Standard

Junk Mail Handling Evaluation Results

Message is not eligible for Junk Mail handling Message is from an internal sender

Junk Mail settings when this message was delivered

None

Junk Mail handling disabled by User

Junk Mail handling disabled by Administrator

Junk List is not enabled

Junk Mail using personal address books is not enabled Block List is not enabled