

**PRM-35-20**  
**(71FR64168)**

DOCKETED  
 USNRC

**From:** Betty Golden  
**To:** SECY  
**Date:** Tue, Jan 9, 2007 1:47 PM  
**Subject:** Fwd: Re: PRM-35-20

January 9, 2007 (2:15pm)

OFFICE OF SECRETARY  
 RULEMAKINGS AND  
 ADJUDICATIONS STAFF

9

>>> "Lynne Fairobent" <[lynne@aapm.org](mailto:lynne@aapm.org)> 01/09/2007 10:58 AM >>>

Alan:

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.

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](mailto:lynne@aapm.org)

>>> "Jackson, Alan (RSO)" <[AlanJ@rad.hfh.edu](mailto:AlanJ@rad.hfh.edu)> 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!-Alan Alan M. Jackson, MS, CHP  
 Radiation Safety Office Henry Ford Hospital Detroit, MI 48202(313) 916-2739 Voice(313) 916-7329

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SECY-02

FaxE-mail: [AlanJ@rad.hfh.edu](mailto:AlanJ@rad.hfh.edu)

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