

PRM-35-20
(71FR64168)

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USNRC

January 11, 2007 (5:00pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

To: NRC

18

The NRC rule change not to recognize ABR certification prior to OCT 2005 has created a lot of operational problems to the hospitals and physicists. The ABR certified Physicists who are not AMPs can not operate any new equipment requiring AMP authorization. NRC requirements of training and experience are impractical and difficult to achieve. A lot of physicists are on solo practice and work in small towns. It is very difficult to obtain preceptor training and certificate in a reasonable amount of time. Introduction of new modalities to treat patients with modern technology is difficult and unobtainable in an efficient way. Physicists with a lot of years of experience have suddenly become ineligible to use new modalities. The AMP classification is fairly new and not many physicists are designated as such in the NRC license.

The NRC does not allow naming more than one physicist as RSO in the license. This also creates operational problems in the absence of the RSO. The qualified person might perform the functions without being recognized in the license or may refuse to perform due to the lack of recognition by NRC

It is therefore requested to recognize ABR certified Physicists with experience as AMPs so that they can perform the functions of a Physicist legally and perform patient care functions efficiently in a cost effective manner.

Thank you.

C.S.Narayanan

Template = SECY-067

SECY-02

From: Carol Gallagher
To: SECY
Date: Thu, Jan 11, 2007 4:51 PM
Subject: Comment on PRM-35-20

Attached for docketing is a comment letter on the above noted PRM that I received via the rulemaking website on 1/11/07.

The commenter's address is:

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Carol

Mail Envelope Properties (45A6B150.255 : 5 : 35764)

Subject: Comment on PRM-35-20
Creation Date Thu, Jan 11, 2007 4:51 PM
From: Carol Gallagher
Created By: CAG@nrc.gov

Recipients

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SECY (SECY)

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Route

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Files	Size	Date & Time
MESSAGE	861	Thursday, January 11, 2007 4:51 PM
TEXT.htm	628	
1795-0015.doc	20992	Thursday, January 11, 2007 4:43 PM

Options

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ReplyRequested: No
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