

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

From: "Wang, Yagang" <ywang@nvcancer.org>
To: <secy@nrc.gov>
Date: Tue, Jan 16, 2007 2:22 PM
Subject: For PRM-35-20

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(90)

January 16, 2007 (3:17pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
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Dear Sir(s)/Madam(s),

I strongly support the AAPM Petition for Rulemaking (PRM-35-20) asking the NRC to amend 10CFR Part 35 to recognize medical physicists certified prior to Oct.25, 2005 to serve as either Authorized Medical Physicist (AMP) or RSO.

It seems the Oct.25, 2005 date line is "a line drawn in the sand". No evidence to suggest that ABR has changed the fundamental certification standard around the date. The new diplomates certified by ABR after 2005 were taking the certification exams set by those "old" diplomates (who were certified before 2005). No evidence to support the rule making assertion that the training and education (T&E) requirements for listing as AMP or RSO acceptable before the date are no longer be acceptable as of the date.

IMHO, not to include this "grandfathering" clause (for both ABR and ABMP) would cause shortages in AMPs and RSOs. It would put undue strain on business and for experienced qualified individuals. Therefore it would negatively impact the continuity and quality of patient care.

Thank you very much for your consideration.

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