

DOCKETED  
USNRC

January 16, 2007

January 18, 2007 (8:30am)

Re: Petition No. PRM-35-20

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

To Whom It May Concern:

This letter is to provide support to the Petition for Rulemaking (PRM-35-20) filed by E. Russell Ritenour, Ph.D. on behalf of the American Association of Physicists in Medicine.

I support the petition to request that the NRC needs to amend 10 CFR Part 35 to recognize the medical physicists certified by ABR or ABMP before October 25, 2005. There is no evidence to support a rulemaking assertion that there is significant difference between the board certification requirements and process before and after October 25, 2005.

In addition, the new 10 CFR part 35 which was published on April 24, 2002 specifies that an individual must have a statement signed by a "preceptor AMP" attesting that the individual is capable of acting independently for the specified modality. However, without medical physicists listed on licenses prior to the new regulation, there is limited opportunity for a medical physicist to serve as a preceptor. Therefore, this requirement is inconsistent with the previous regulations before the concept of the AMP was introduced.

I would appreciate that the NRC to amend the Part 35 as stated in the Petition for rulemaking (PRM-35-20).

Sincerely,

Hui Li, Ph.D, ABR  
Mercy Medical Center  
701 10<sup>th</sup> St., SE  
Cedar Rapids, IA 52403

Template = SECY-067

SECY-02

**From:** Carol Gallagher  
**To:** SECY  
**Date:** Wed, Jan 17, 2007 4:57 PM  
**Subject:** Comment letter on PRM-35-20

Attached for docketing is a comment letter on the above noted PRM that I received via the rulemaking website on 1/16/07.

Carol

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**Subject:** Comment letter on PRM-35-20  
**Creation Date** Wed, Jan 17, 2007 4:57 PM  
**From:** Carol Gallagher

**Created By:** CAG@nrc.gov

**Recipients**

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TEXT.htm	404	
1795-0101.doc	24064	Wednesday, January 17, 2007 4:21 PM

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