

TRANSMISSION VERIFICATION REPORT

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

TELEFAX TRANSMITTAL

DATE: June 21, 2007 NUMBER OF PAGES: 26
(Including this page)

SEND TO: Carlo Santa Ana, M.S. DABR - Medical Physicist

LOCATION: Hackley Hospital- Radiation Oncology

FAX NUMBER: (231) 728-4062 **VERIFY BY CALLING
SENDER**

FROM:
(SENDER) **Bill Reichhold**

TELEPHONE NUMBER **(630) 829-9839** FAX NUMBER **(630) 515-1078**

If you do not receive the complete fax transmittal, please contact the sender as soon as possible at the telephone number provided above.

MESSAGE



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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MESSAGE

Please see accompanying documents.

NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone and return the original to the above address, by U.S. Mail. Thank you.

The following additional information is needed to complete the review of your request.

1. Please resubmit the request to have you named as the new Radiation Safety Officer. The request needs to be signed by an individual (other than yourself) that is authorized to make binding commitments and to sign official documents on behalf of your hospital for your NRC license. Please see accompanying document section 8.30, Item 13, "Certification" from NUREG-1556, Volume 9, Revision 1.
2. You need to choose a different pathway to show your training and experience for the Radiation Safety Officer. You cannot use the "Board Certification" pathway because you need to be certified by a board recognized by the NRC. See accompanying copy of "Specialty Board(s) Certification Recognized by NRC Under 10 CFR Part 35". You may wish to choose an alternate pathway such as "Authorized Medical Physicist Identified on the Licensee's License". See accompanying documents, "Licensing Guidance for using the NRC FORM 313A Series of Forms" and the NRC Form 313A (RSO)". Please resubmit the NRC Form 313A (RSO).
3. Please make sure you complete the information for the Supervising Individual in Item 3. c. See accompanying NRC Form 313A (RSO).
4. Please specify if you still wish to have David Waid, M.S., DABMP, listed as an authorized medical physicist on your NRC license.

Please send a facsimile of your response to the above within 7 days and refer to control *316234*. Please call me at 630-829-9839 if you have any questions.

From the desk of:



Bill Reichhold

CONTENTS OF AN APPLICATION

implanted the device is responsible for the follow-up, explantation, and return of the pacemaker to the manufacturer for proper disposal. NRC Information Notice 98-12, "Licensees' Responsibilities Regarding Reporting and Follow-up Requirements for Nuclear-Powered Pacemakers," provides additional information.

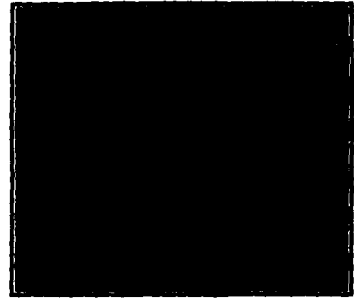
Response from Applicant: Provide the following statement:

"We have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of Subpart K to 10 CFR Part 20 and 10 CFR 35.92."

8.29 ITEM 12: FEES

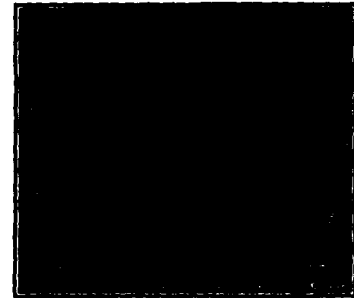
Regulations: 10 CFR 170.31.

On NRC Form 313, enter the appropriate fee category from 10 CFR 170.31 and the amount of the fee enclosed with the application.



8.30 ITEM 13: CERTIFICATION

Individuals acting in a private capacity are required to date and sign NRC Form 313. Otherwise, representatives of the corporation or legal entity filing the application should date and sign NRC Form 313. These representatives must be authorized to make binding commitments and to sign official documents on behalf of the applicant. An application for licensing a medical facility must be signed by the applicant's or licensee's management. The individual who signs the application should be identified by title of the office held. As discussed previously in Section 3, "Management Responsibility," signing the application acknowledges management's commitment and responsibilities for the radiation protection program. Management includes the chief executive officer or other individual having the authority to manage, direct, or administer the licensee's activities, or those persons' delegate or delegates. NRC will return all unsigned applications for proper signature.



Note: It is a criminal offense to make a willful false statement or representation on applications or correspondence (18 U.S.C. 1001).

NRC FORM 313A (RSO) (10-2006)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB: NO. 3150-0120 EXPIRES: 10/31/2008
RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION [10 CFR 35.50]		

Name of Proposed Radiation Safety Officer

Requested Authorization(s) *The license authorizes the following medical uses (check all that apply):*

35.100
 35.200
 35.300
 35.400
 35.500
 35.600 (remote afterloader)

35.600 (teletherapy)
 35.600 (gamma stereotactic radiosurgery)
 35.1000 ()

CAN NOT USE THIS PATHWAY

PART I - TRAINING AND EXPERIENCE
(Select one of the four methods below)

*Training and Experience, including board certification, must have been obtained within the 7 years preceding the date of application or the individual must have obtained related continuing education and experience since the required training and experience was completed. Provide dates, duration, and description of continuing education and experience related to the uses checked above.

1. **Board Certification**
- a. Provide a copy of the board certification.
 - b. Use Table 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
 - c. Skip to and complete Part II Preceptor Attestation.

OR

2. **Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Uses Checked Above**
- a. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for the additional types of medical use for which recognition as RSO is sought.
 - b. Skip to and complete Part II Preceptor Attestation.

OR

3. **Structured Educational Program for Proposed Radiation Safety Officer**
- a. Classroom and Laboratory Training

Description of Training	Location of Training	Clock Hours	Dates of Training
Radiation physics and Instrumentation			
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Chemistry of byproduct material for medical use			
Radiation biology			

Total Hours of Training:

NRC FORM 313A (R90)
(10-2006)

U.S. NUCLEAR REGULATORY COMMISSION

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

b. Supervised Radiation Safety Experience

(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)

Description of Experience	Location of Training/ License or Permit Number of Facility	Dates of Training*
Shipping, receiving, and performing related radiation surveys		
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides		
Securing and controlling byproduct material		
Using administrative controls to avoid mistakes in administration of byproduct material		
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures		
Using emergency procedures to control byproduct material		
Disposing of byproduct material		
Licensed Material Used (e.g., 35.100, 35.200, etc.)+		

* Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes and quantities used: 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 remote afterloader units, 35.600 teletherapy units, 35.800 gamma stereotactic radiosurgery units, emerging technologies (provide list of devices).

NRC FORM 313A (R80)
(10-2006)

U.S. NUCLEAR REGULATORY COMMISSION

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

b. Supervised Radiation Safety Experience (continued)

(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)

Supervising Individual

License/Permit Number listing supervising individual as a Radiation Safety Officer

This license authorizes the following medical uses:

- 35.100 35.200 35.300 35.400
- 35.500 35.600 (remote afterloader) 35.600 (teletherapy)
- 35.600 (gamma stereotactic radiosurgery) 35.1000 ()

c. Describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.

Description of Training	Training Provided By	Dates of Training*
Radiation safety, regulatory issues, and emergency procedures for 35.100, 35.200, and 35.500 uses	WAYNE STATE UNIVERSITY MEDICAL PHYSICS PROGRAM AAPM SUMMER SCHOOL	MAY-JULY 1995 JULY 2005
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	WAYNE STATE UNIVERSITY AAPM SUMMER SCHOOL	MAY-JULY 1995 JULY 2005
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	WAYNE STATE UNIVERSITY AAPM SUMMER SCHOOL	MAY-JULY 1995 JULY 2005
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses	WAYNE STATE UNIVERSITY AAPM SUMMER SCHOOL	MAY-JULY 1995 JULY 2005
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses	WAYNE STATE UNIVERSITY AAPM SUMMER SCHOOL	MAY-JULY 1995 JULY 2005
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses		
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):		

NRC FORM 313A (RSO)
(10-2006)

U.S. NUCLEAR REGULATORY COMMISSION

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)

Supervising Individual: If training was provided by supervising RSO, AU, AMP, or ANP. (If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.) License/Permit Number listing supervising individual

License/Permit lists supervising individual as:

- Radiation Safety Officer Authorized User Authorized Nuclear Pharmacist
- Authorized Medical Physicist

Authorized as RSO, AU, ANP, or AMP for the following medical uses:

- 35.100 35.200 35.300 35.400
- 35.500 35.600 (remote afterloader) 35.800 (teletherapy)
- 35.600 (gamma stereotactic radiosurgery) 35.1000 ()

d. Skip to and complete Part II Preceptor Attestation.

OR

4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist identified on the licensee's license

- a. Provide license number.
- b. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
- c. Skip to and complete Part II Preceptor Attestation.

PART II - PRECEPTOR ATTESTATION

Note: This part must be completed by the individual's preceptor. The preceptor does not have to be the supervising individual as long as the preceptor provides, directs, or verifies training and experience required. If more than one preceptor is necessary to document experience, obtain a separate preceptor statement from each.

First Section

Check one of the following:

1. Board Certification

I attest that CARLO T. SANTA ANNA has satisfactorily completed the requirements in

Name of Proposed Radiation Safety Officer

10 CFR 35.50(a)(1)(i) and (a)(1)(ii); or 35.50 (a)(2)(i) and (a)(2)(ii); or 35.50(c)(1).

OR

2. Structured Educational Program for Proposed Radiation Safety Officers

I attest that _____ has satisfactorily completed a structural educational

Name of Proposed Radiation Safety Officer

program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).

OR

NEED THIS Completed

NRC FORM 313A (RSO)
(10-2006)

U.S. NUCLEAR REGULATORY COMMISSION

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

Preceptor Attestation (continued)

First Section (continued)

Check one of the following:

3. Additional Authorization as Radiation Safety Officer

I attest that CARLO T. SANTA ANA is an
Name of Proposed Radiation Safety Officer

Authorized User

Authorized Nuclear Pharmacist

Authorized Medical Physicist

Identified on the Licensee's license and has experience with the radiation safety aspects of similar type of use of byproduct material for which the individual has Radiation Safety Officer responsibilities

AND

Second Section

Complete for all (check all that apply):

I attest that CARLO T. SANTA ANA has training in the radiation safety, regulatory issues, and
Name of Proposed Radiation Safety Officer

emergency procedures for the following types of use:

35.100

35.200

35.300 oral administration of less than or equal to 33 millicuries of sodium iodide I-131, for which a written directive is required

35.300 oral administration of greater than 33 millicuries of sodium iodide I-131

35.300 parenteral administration of any beta-emitter, or a photon-emitting radionuclide with a photon energy less than 150 keV for which a written directive is required

35.300 parenteral administration of any other radionuclide for which a written directive is required

35.400

35.500

35.600 remote afterloader units

35.600 teletherapy units

35.600 gamma stereotactic radiosurgery units

35.1000 emerging technologies, including:

NRC FORM 313A (RSO)
(10-2006)

U.S. NUCLEAR REGULATORY COMMISSION

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

AND

Third Section
Complete for ALL

I attest that CARLO T. SANTA ANA has achieved a level of radiation safety knowledge
Name of Proposed Radiation Safety Officer
sufficient to function independently as a Radiation Safety Officer for a medical use licensee.

Fourth Section
Complete the following for Preceptor Attestation and signature

I am the Radiation Safety Officer for HACKLEY HOSPITAL
Name of Facility

License/Permit Number: 21-04125-01

Name of Preceptor

David Waid

Signature

[Signature]

Telephone Number

(231) 728-4842

Date

5/4/07

NOT LISTED
ON NRC website
AS RECOGNIZED BY NRC

The American Board of Radiology

Organized through the cooperation of the
American College of Radiology, the American Roentgen Ray Society,
the American Radium Society, the Radiological Society of North America,
the Section on Radiology of the American Medical Association,
the American Society for Therapeutic Radiology and Oncology, the Association of
University Radiologists, and American Association of Physicians in Medicine

Nowby certifies that

Carlo Thaden Santa Ana, MS

Has pursued an accepted course of graduate study
and clinical work, has met certain standards and qualifications and
has passed the examinations conducted under the authority of
The American Board of Radiology

On this eleventh day of June, 2002

Thereby demonstrating to the satisfaction of the Board
that he is qualified to practice the specialty of

Therapeutic Radiologic Physics



R.P. Hackley, D.
President

Stuart A. Schiff, M.D.
Secretary-Treasurer

M. [Signature] A.D.
Executive Director

Certificate No. #2817

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Specialty Board(s) Certification Recognized by NRC Under 10 CFR Part 35

→ §35.50 Training for Radiation Safety Officer
American Board of Health Physics from January 1, 2005 to present.

American Board of Science in Nuclear Medicine from June 2006 forward for the Nuclear Medicine Physics and Instrumentation Specialty and the Radiation Protection Specialty.

American Board of Radiology (ABR) certification process from June 2007 forward for the Radiologic Physics - Medical Nuclear Physics and the Radiologic Physics - Diagnostic Radiologic Physics specialties for diplomates who have been issued certificates before and after that date with the words "RSO Eligible" appearing above the ABR seal."

§35.51 Training for an authorized medical physicist
American Board of Radiology (ABR) certification process from June, 2007 forward for the Radiologic Physics - Therapeutic Radiologic Physics specialty for diplomates who have been issued certificates before and after that date with the words "AMP Eligible" appearing above the ABR seal."**

**Diplomates from June 2007 forward certified under 10 CFR 35.51 for the Therapeutic Radiologic Physics subspecialty of the ABR-Radiologic Physics specialty also satisfy the certification portion of the regulatory requirements in 10 CFR 35.50(c)(1) for Radiation Safety Officer authorization.

§35.55 Training for an authorized nuclear pharmacist
Board of Pharmaceutical Specialties certification process for Board Certified Nuclear Pharmacist (BCNP) from March 6, 1996 to present.

§35.190 Training for uptake, dilution, and excretion studies
American Board of Nuclear Medicine certification process from October 20, 2005 to present for all physicians before and after that date issued an ABNM certification with the word "United States" appearing under the certification number.

§35.290 Training for imaging and localization studies
Certification Board of Nuclear Cardiology certification process from October 29, 2000 to present for certificates issued to physicians residing in the United States.


American Board of Nuclear Medicine certification process from October 20, 2005 to present for all physicians issued an ABNM certifications before and after that date with the word "United States" appearing under the certification number.


American Osteopathic Board of Radiology (AOBR) certification process from July 1, 2000 forward for the Diagnostic Radiology specialty.

American Osteopathic Board of Nuclear Medicine (AOBNM) certification process from May 18, 2006 forward for the Nuclear Medicine specialty.

American Board of Radiology (ABR) certification process from June 2006 forward for the Diagnostic

Radiology  certificates issued before and after that date with the words "AU eligible" appearing above the ABR seal.

§35.390 Training for use of unsealed byproduct material for which a written directive is required
American Board of Nuclear Medicine certification process from October 20, 2005 to present for all physicians before and after that date issued an ABNM certification  with the word "United States" appearing under the certification number. *


American Board of Radiology (ABR) certification process from June, 2007 forward for the Radiation Oncology  specialty with the words "AU eligible" appearing above the ABR seal. *

American Osteopathic Board of Radiology (AOBR) certification process from May 1, 2007 forward for the Radiation Oncology specialty. *

*Diplomates of this specialty board also satisfy the training and experience requirements in 10 CFR 35.392 and 35.394.


§35.392 Training for the oral administration of sodium iodide I-131 requiring a written directive in quantities less than or equal to 1.22 gigabecquerels (33 millicuries)

American Osteopathic Board of Radiology (AOBR) certification process from July 1, 2000 forward for the Diagnostic Radiology specialty.

American Board of Radiology (ABR) certification process from June 2006 forward for the Diagnostic Radiology  certificates issued before and after that date with the words "AU eligible" appearing above the ABR seal.

§35.394 Training for the oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 gigabecquerels (33 millicuries)
None


§35.490 Training for use of manual brachytherapy sources

American Board of Radiology (ABR) certification process from June, 2007 forward for the Radiation Oncology  specialty with the words "AU eligible" appearing above the ABR seal.

American Osteopathic Board of Radiology (AOBR) certification process from May 1, 2007 forward for the Radiation Oncology specialty.

§35.590 Training for use of sealed sources for diagnosis
None

§35.690 Training for use of remote afterloader units, teletherapy units, and gamma stereotactic radiosurgery units

American Board of Radiology (ABR) certification process from June, 2007 forward for the Radiation Oncology  specialty with the words "AU eligible" appearing above the ABR seal.

American Osteopathic Board of Radiology (AOBR) certification process from May 1, 2007 forward for the Radiation Oncology specialty.

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Friday, June 01, 2007

Licensing Guidance for using the NRC FORM 313A Series of Forms

Documentation of Training and Experience to Identify Individuals on a License as Authorized User, Radiation Safety Officer, Authorized Nuclear Pharmacist, or Authorized Medical Physicist

I. Experienced Authorized Users, Authorized Medical Physicists, Authorized Nuclear Pharmacists, or Radiation Safety Officer

An applicant or licensee that is adding an experienced authorized user, authorized medical physicist, authorized nuclear pharmacist, or Radiation Safety Officer to its medical use license only needs to provide evidence that the individual is listed on a medical use license issued by the Commission or Agreement State, a permit issued by a Commission master material licensee, a permit issued by a Commission or Agreement State broad scope licensee, or a permit issued by a Commission master material broad scope permittee before October 25, 2005 provided that the individual is authorized for the same types of use(s) requested in the application under review, and the individual meets the recentness of training criteria described in 10 CFR 35.59. When adding an experienced authorized nuclear pharmacist to the license, the applicant also may provide evidence that the individual is listed on an NRC or Agreement State commercial nuclear pharmacy license or identified as an authorized nuclear pharmacist by a commercial nuclear pharmacy authorized to identify authorized nuclear pharmacists. For individuals who have been previously authorized by, but not listed on, the commercial nuclear pharmacy license, medical broad scope license, or master materials license medical broad scope permit, the applicant should submit either verification of previous authorizations granted or evidence of acceptable training and experience.

II. Applications that Include Individuals for New Authorized User, Authorized Medical Physicist, Authorized Nuclear Pharmacist or Radiation Safety Officer Recognition by NRC

Applicants should submit the appropriate completed form in the NRC Form 313A series to show that the individuals meet the correct training and experience criteria in 10 CFR Part 35 subparts B, D, E, F, G, and H. For the applicant's convenience, the NRC Form 313A series has been separated into six separate forms. The forms are NRC FORM 313A (RSO) for the Radiation Safety Officer; NRC FORM 313A (AMP) for the authorized medical physicist; NRC FORM 313A (ANP) for the authorized nuclear pharmacist; NRC FORM 313A (AUD) for the authorized user of the medical uses included in 35.100, 35.200, and/or 35.500; NRC FORM 313A (AUT) for the authorized user for the medical use included in 35.300; and NRC FORM 313A (AUS) for the authorized user for the medical uses included in 35.400 and/or 35.600.

There are two primary training and experience routes to qualify an individual as an authorized user, authorized medical physicist, authorized nuclear pharmacist, or Radiation Safety Officer. The first is by means of certification by a board recognized by NRC and listed on the NRC web site as provided in 10 CFR 35.50(a), 35.51(a), 35.55(a), 35.190(a), 35.290(a), 35.390(a), 35.392(a), 35.394(a), 35.490(a), 35.590(a), or 35.690(a). Preceptor attestations must also be submitted for all individuals to qualify under Subparts B and D through H. Additional training may need to also be documented for Radiation Safety Officers, authorized medical physicists, and 35.600 authorized users. The second route is by meeting the structured educational program, supervised work experience, and preceptor attestation requirements in 10 CFR Part 35, subparts B, D, E, F, G, and H.

In some cases there may be additional training and experience routes for recognized authorized users, authorized nuclear pharmacists, authorized medical physicists or Radiation Safety Officers to seek additional authorizations.

III. Recentness of Training

The required training and experience, including board certification, described in 10 CFR Part 35 must be obtained within the 7 years preceding the date of the application, or the individual must document having had related continuing education, retraining, and experience since obtaining the required training and experience. Examples of acceptable continuing education and experience include the following:

1. Successful completion of classroom and laboratory review courses that include radiation safety practices relative to the proposed type of authorized medical use;
2. Practical and laboratory experience with patient procedures using radioactive material for the same use(s) for which the applicant is requesting authorization;
3. Practical and laboratory experience under the supervision of an AU at the same or another licensed facility that is authorized for the same use(s) for which the applicant is requesting authorization; and
4. For therapy devices, experience with the therapy unit and/or comparable linear accelerator experience and completion of an in-service review of operating and emergency procedures relative to the therapy unit to be used by the applicant.

IV. General Instructions and Guidance for Filling Out NRC Form 313A Series

If the applicant is proposing an individual for more than one type of authorization, the applicant may need to either submit multiple NRC Form 313A series forms or fill out some sections more than once. For example, an applicant that requests a physician be authorized for 35.200 and 35.300 medical uses and as the RSO, needs to provide three completed NRC Form 313A series forms, i.e., NRC Form 313A (RSO), NRC Form 313A (AUD) and NRC Form 313A (AUT).

Also, if the applicant requests a physician be authorized for both high dose rate remote

afterloading and gamma stereotactic radiosurgery under 35.600, only one form, NRC Form 313A (AUS) needs to be completed, but one part (i.e., "Supervised Work and Clinical Experience") must be filled out twice.

If you need to identify a license and it is an Agreement State license, provide a copy of the license. If you need to identify a Master Materials License permit, provide a copy of the permit. If you need to identify an individual (i.e., supervising individual or preceptor) who is authorized under a broad scope license or broad scope permit of a Master Materials License, provide a copy of the permit issued by the broad scope licensee/permittee. Alternatively, you may provide a statement signed by the Radiation Safety Officer or chairperson of the Radiation Safety Committee similar to the following: " _____ (name of supervising individual or preceptor) is authorized under _____ (name of licensee/permittee) broad scope license number _____ to use _____ (materials) during _____ (time frame)".

INTRODUCTORY INFORMATION

Name of individual

Provide the individual's complete name so that NRC can distinguish the training and experience received from that received by others with a similar name.

Note: Do not include personal or private information (e.g., date of birth, social security number, home address, personal phone number) as part of your qualification documentation.

State or territory where licensed

NRC requires physicians, dentists, podiatrists, and pharmacists to be licensed by a state or territory of the United States, the District of Columbia, or the Commonwealth of Puerto Rico to prescribe drugs in the practice of medicine, practice of dentistry, practice of podiatry, or practice of pharmacy, respectively (see definition of "Physician" in 10 CFR 35.2).

Requested Authorization(s)

Check all authorizations that apply and fill in the blanks as provided.

Part I. Training and Experience

There are always multiple pathways provided for each training and experience section. Select the applicable one.

Item 1. Board Certification

The applicant or licensee may use this pathway if the proposed new authorized individual is certified by a board recognized by NRC (to confirm that NRC recognizes that boards certifications see NRC's web page <http://www.nrc.gov/materials/miau/med-use-toolkit.html>).

Note: An individual that is board eligible will not be considered for this pathway until the individual is actually board certified. Further, individuals holding other board certifications will also not be considered for this pathway.

The applicant or licensee will need to provide a copy of the board certification and other training, experience, or clinical casework as indicated on the specific form of the NRC Form 313A series.

All applicants under this pathway (except for 35.500 uses) must submit a completed Part II Preceptor Attestation.

Item 2. Current Authorized Individuals Seeking Additional Authorizations

Provide the information requested for training, experience, or clinical casework as indicated on the specific form of the NRC Form 313A series. (**Note:** This section does not include individuals who are authorized only on foreign licenses.)

All applicants under this pathway must submit a completed Part II Preceptor Attestation.

Item 3. Training and Experience for Proposed New Authorized Individuals

This pathway is used for those individuals not listed on the license as an authorized individual, who cannot meet requirements for the board certification pathway.

The proposed authorized individual is not required to receive the classroom and laboratory training, supervised work experience, or clinical casework at any one location or at one time, therefore space is provided to identify each location and date of training or experience. The date should be provided in the month/day/year format. The clock hours must be indicated for those individuals that must meet a minimum number of training and work experience hours. The specific number of hours needed for each training element will depend upon the type of approval sought.

Note: Classroom and Laboratory Training or Didactic Training may be provided at medical teaching/university institutions. In some cases, a course may be provided for that particular need and taught in consecutive days; in others, the period may be a semester or quarter as part of the formal curriculum. The required "structural educational programs" or "training" may be obtained in any number of settings, locations, and educational situations.

The NRC expects that clinical laboratory hours credited toward meeting the requirements for classroom and laboratory training will involve training in radiation safety aspects of the medical use of byproduct material. The NRC recognizes, for example, that physicians in training may not dedicate all of their clinical laboratory time specifically to the subject areas covered in these subparts and will be attending to other clinical matters involving the medical use of the material under the supervision of an AU (e.g., reviewing case histories or interpreting scans). However, those hours spent on other duties, not related to radiation safety, should not be counted toward the minimum number of hours of required classroom and laboratory training in radiation safety. This type of supervised work experience, even though not specifically required by the NRC, may be counted toward the supervised work experience to obtain the required total hours of training.

Similarly, the NRC recognizes that clinicians will not dedicate all of their time in training specifically to the subject areas described and will be attending to other clinical matters. The NRC will broadly interpret "classroom training" to include various types of instruction received by candidates for approval, including online training, as long as the subject matter relates to radiation safety and safe handling of byproduct material.

Note: If the proposed new authorized individual had more than one supervisor, provide the information requested for each supervising individual.

Part II. Preceptor Attestation

The NRC defines the term "preceptor" in 10 CFR 35.2, "Definitions," to mean "an individual who provides, directs, or verifies training and experience required for an individual to become an authorized user, an authorized medical physicist, an authorized nuclear pharmacist, or a Radiation Safety Officer." While the supervising individual for the work experience may also be the preceptor, the preceptor does not have to be the supervising individual as long as the preceptor directs or verifies the training and experience required. The preceptor must attest in writing regarding the training and experience of any individual to serve as an authorized individual and attest that the individual has satisfactorily completed the appropriate training and experience criteria and has achieved a level of competency or a level of radiation safety knowledge sufficient to function independently. This preceptor also has to meet specific requirements.

The NRC may require supervised work experience conducted under the supervision of an authorized individual in a licensed material use program. In this case, a supervisor is an individual who provides frequent direction, instruction, and direct oversight of the student as the student completes the required work experience in the use of byproduct material.

Supervision may occur at various licensed facilities, from a large teaching university hospital to a small private practice.

The NRC Form 313A series Part II - Preceptor Attestation pages have multiple sections. The preceptor must complete an attestation of the proposed user's training, experience, and

competency to function independently, as well as provide information concerning his/her own qualifications and sign the attestation. Because there are a number of different pathways to obtain the required training and experience for different authorized individuals, specific instructions are provided below for each NRC 313A series form.

V. RADIATION SAFETY OFFICER - Specific Instructions and Guidance for Filling Out NRC Form 313A (RSO)

See Section IV. "General Instructions and Guidance for Filling out NRC Form 313A Series" for additional clarification on providing information about an individual's status on an Agreement State license, medical broad scope license, or Master Materials License permit.

Part I. Training and Experience - select one of four methods below:

Item 1. Board Certification

Provide the requested information, i.e., a copy of the board certification, documentation of specific radiation safety training for all types of use on the license, and completed preceptor attestation. As indicated on the form, additional information is needed if the board certification or radiation safety training was greater than 7 years ago.

Specific radiation safety training for each type of use on the license may be supervised by a Radiation Safety Officer, an authorized medical physicist, authorized nuclear pharmacist, or authorized user who is authorized for that type of use. The applicant only has to identify the supervising individual in the table in 3.c and his/her qualifications if the source of this training was a Radiation Safety Officer, an authorized medical physicist, authorized nuclear pharmacist, or authorized user. If more than one supervising individual provided the training, identify each supervising individual by name and provide their qualifications.

Item 2. Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Use(s) Checked above.

Provide the requested information, i.e., documentation of specific radiation safety training (complete the table in 3.c) and completed preceptor attestation in Part II. As indicated on the form, additional information is needed if the specific radiation safety training was greater than 7 years ago.

Specific radiation safety training for each type of use on the license may be supervised by a Radiation Safety Officer, an authorized medical physicist, authorized nuclear pharmacist, or authorized user who is authorized for that type of use. The applicant only has to identify the supervising individual in the table in 3.c and his/her qualifications if the source of this training was a Radiation Safety Officer, an authorized medical physicist, authorized nuclear pharmacist,

or authorized user. If more than one supervising individual provided the training, identify each supervising individual by name and provide their qualifications.

Item 3. Structured Educational Program for Proposed New Radiation Safety Officer

As indicated on the form, additional information is needed if the training, supervised radiation safety experience, and specific radiation safety training was completed more than 7 years ago.

Submit a completed section 3.a.

Submit a completed section 3.b. The individual must have completed one year of full-time radiation safety experience under the supervision of a Radiation Safety Officer. This is documented in section 3.b by providing the ranges of dates for supervised radiation safety experience. If there was more than one supervising individual, identify each supervising individual by name and provide their qualifications.

Provide the requested information, i.e., documentation of specific radiation safety training for each use on the license (complete the table in 3.c). Specific radiation safety training for each type of use on the license may be supervised by a Radiation Safety Officer, an authorized medical physicist, authorized nuclear pharmacist, or authorized user who is authorized for that type of use. The applicant only has to identify the supervising individual in the table in 3.c and his/her qualifications if the source of this training was a Radiation Safety Officer, an authorized medical physicist, authorized nuclear pharmacist, or authorized user. If more than one supervising individual provided the training, identify each supervising individual by name and provide their qualifications.

Submit a completed preceptor attestation in Part II.

Item 4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist Identified on the Licensee's License

Provide the requested information, i.e., the license number and documentation of specific radiation safety training for each use on the license (complete the table in 3.c). As indicated on the form, additional information is needed if the specific radiation safety training was greater than 7 years ago.

Specific radiation safety training for each type of use on the license may be supervised by a Radiation Safety Officer, an authorized medical physicist, authorized nuclear pharmacist, or authorized user who is authorized for that type of use. If more than one supervising individual provided the training, identify each supervising individual by name and provide their qualifications.

Part II. Preceptor Attestation

The Preceptor Attestation page has four sections.

- The attestation to the new proposed Radiation Safety Officer's training or identification on the license as an authorized user, authorized medical physicist, or authorized nuclear pharmacist is in the first section.
- The attestation for the specific radiation safety training is in the second section.
- The attestation of the individual's competency to function independently as a Radiation Safety Officer for a medical use license is in the third section.
- The fourth and final section requests specific information about the preceptor's

authorization as a Radiation Safety Officer on a medical use license in addition to the preceptor's signature.

The preceptor for a new proposed Radiation Safety Officer must fill out all four sections of this page.

The preceptor for a Radiation Safety Officer seeking authorization to be recognized as a Radiation Safety Officer for the additional medical use(s) must fill out the second, third, and fourth sections.

VI. AUTHORIZED MEDICAL PHYSICIST - Specific Instructions and Guidance for Filling Out NRC Form 313A (AMP)

See Section IV. "General Instructions and Guidance for Filling out NRC Form 313A Series" for additional clarification on providing information about an individual's status on an Agreement State license, medical broad scope license, or Master Materials License permit.

Part I. Training and Experience - select one of the three

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE
AND PRECEPTOR ATTESTATION
[10 CFR 35.50]**

APPROVED BY OMB: NO. 3150-0120
EXPIRES: 10/31/2008

Name of Proposed Radiation Safety Officer

Requested Authorization(s) *The license authorizes the following medical uses (check all that apply):*

- 35.100 35.200 35.300 35.400 35.500 35.600 (remote afterloader)
 35.600 (teletherapy) 35.600 (gamma stereotactic radiosurgery) 35.1000 (_____)

PART I -- TRAINING AND EXPERIENCE
(Select one of the four methods below)

*Training and Experience, including board certification, must have been obtained within the 7 years preceding the date of application or the individual must have obtained related continuing education and experience since the required training and experience was completed. Provide dates, duration, and description of continuing education and experience related to the uses checked above.

1. Board Certification

- a. Provide a copy of the board certification.
- b. Use Table 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
- c. Skip to and complete Part II Preceptor Attestation.

OR

2. Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Uses Checked Above

- a. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for the additional types of medical use for which recognition as RSO is sought.
- b. Skip to and complete Part II Preceptor Attestation.

OR

3. Structured Educational Program for Proposed Radiation Safety Officer

a. Classroom and Laboratory Training

Description of Training	Location of Training	Clock Hours	Dates of Training*
Radiation physics and instrumentation			
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Chemistry of byproduct material for medical use			
Radiation biology			

Total Hours of Training:

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

b. Supervised Radiation Safety Experience

(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)

Description of Experience	Location of Training/ License or Permit Number of Facility	Dates of Training*
Shipping, receiving, and performing related radiation surveys		
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides		
Securing and controlling byproduct material		
Using administrative controls to avoid mistakes in administration of byproduct material		
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures		
Using emergency procedures to control byproduct material		
Disposing of byproduct material		
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ _____ _____ _____		

+ Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes and quantities used: 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 remote afterloader units, 35.600 teletherapy units, 35.600 gamma stereotactic radiosurgery units, emerging technologies (provide list of devices).

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

b. Supervised Radiation Safety Experience (continued)

(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)

Supervising Individual	License/Permit Number listing supervising individual as a Radiation Safety Officer
This license authorizes the following medical uses:	
<input type="checkbox"/> 35.100	<input type="checkbox"/> 35.200
<input type="checkbox"/> 35.500	<input type="checkbox"/> 35.300
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.400
	<input type="checkbox"/> 35.600 (teletherapy)
	<input type="checkbox"/> 35.1000 (_____)

c. Describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.

Description of Training	Training Provided By	Dates of Training*
Radiation safety, regulatory issues, and emergency procedures for 35.100, 35.200, and 35.500 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses		
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):		

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

- c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)

Supervising Individual *If training was provided by supervising RSO, AU, AMP, or ANP. (If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.)*

License/Permit Number listing supervising individual

License/Permit lists supervising individual as:

- Radiation Safety Officer Authorized User Authorized Nuclear Pharmacist
- Authorized Medical Physicist

Authorized as RSO, AU, ANP, or AMP for the following medical uses:

- 35.100 35.200 35.300 35.400
- 35.500 35.600 (remote afterloader) 35.600 (teletherapy)
- 35.600 (gamma stereotactic radiosurgery) 35.1000 (_____)

- d. Skip to and complete Part II Preceptor Attestation.

OR

4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist identified on the licensee's license

- a. Provide license number.
- b. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
- c. Skip to and complete Part II Preceptor Attestation.

PART II – PRECEPTOR ATTESTATION

Note: This part must be completed by the individual's preceptor. The preceptor does not have to be the supervising individual as long as the preceptor provides, directs, or verifies training and experience required. If more than one preceptor is necessary to document experience, obtain a separate preceptor statement from each.

First Section

Check one of the following:

1. Board Certification

I attest that _____ has satisfactorily completed the requirements in

Name of Proposed Radiation Safety Officer

10 CFR 35.50(a)(1)(i) and (a)(1)(ii); or 35.50 (a)(2)(i) and (a)(2)(ii); or 35.50(c)(1).

OR

2. Structured Educational Program for Proposed Radiation Safety Officers

I attest that _____ has satisfactorily completed a structural educational

Name of Proposed Radiation Safety Officer

program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).

OR

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

Preceptor Attestation (continued)

First Section (continued)

Check one of the following:

3. Additional Authorization as Radiation Safety Officer

I attest that _____ is an
Name of Proposed Radiation Safety Officer

Authorized User

Authorized Nuclear Pharmacist

Authorized Medical Physicist

identified on the Licensees license and has experience with the radiation safety aspects of similar type of use of byproduct material for which the individual has Radiation Safety Officer responsibilities

AND

Second Section

Complete for all (check all that apply):

I attest that _____ has training in the radiation safety, regulatory issues, and
Name of Proposed Radiation Safety Officer

emergency procedures for the following types of use:

35.100

35.200

35.300 oral administration of less than or equal to 33 millicuries of sodium iodide I-131, for which a written directive is required

35.300 oral administration of greater than 33 millicuries of sodium iodide I-131

35.300 parenteral administration of any beta-emitter, or a photon-emitting radionuclide with a photon energy less than 150 keV for which a written directive is required

35.300 parenteral administration of any other radionuclide for which a written directive is required

35.400

35.500

35.600 remote afterloader units

35.600 teletherapy units

35.600 gamma stereotactic radiosurgery units

35.1000 emerging technologies, including:

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

AND

**Third Section
Complete for ALL**

I attest that _____ has achieved a level of radiation safety knowledge
Name of Proposed Radiation Safety Officer
sufficient to function independently as a Radiation Safety Officer for a medical use licensee.

**Fourth Section
Complete the following for Preceptor Attestation and signature**

I am the Radiation Safety Officer for _____
Name of Facility

License/Permit Number: _____

Name of Preceptor	Signature	Telephone Number	Date