

March 10, 2008

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US NRC
Division of Materials Safety and State Agreements
Office of Federal and State Materials and
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Washington DC 20555

Please refer this letter to the proper person.

Copy e-mailed to Janet R. Schlueter, Ronald Zelac, and Duane White

Dear MS Schlueter,

I am a medical physicist who does locum work only. According to the American Association of Medical Physicist (AAPM) only about 1 percent of the membership does full time locum work. I am American Board of Radiology (ABR) certified in therapeutic physics. I live in Florida and have a Florida license. I am also a registered medical physics in some other states. I have been doing locum work since 1994.

The treatments and procedures being done in radiation oncology have become more complex. With IMRT, IGRT, HDR and other procedures there is a need for more medical physicist. However there is a shortage of medical physicist. Thus when a facility loses a physicist they have a need for temporary help. Since I am a person who provides this temporary help I need to know how some of the new NRC regulations will affect me.

This is questions about the new regulations which were suppose to gone into effect March 1 concerning listing a medical physicist on a license for brachytherapy and high dose rate (HDR) procedures. I have experience in these procedures; however I have not been on a current license. I have been listed as the physicist on a Florida HDR license but that was a few years ago and that license has been renewed. I would like to know how the new regulations will affect me in getting locum work and also what a problem this will create for the facility doing the procedures. I have checked with Florida Radiation Control and with agencies in other states but have not gotten any answers to the questions below. I have also found out many state legislators have not passed the new regulations and thus they are not in effect.

Here are some questions that I would like the NRC to answer.

1. Since I only do locum work, I have little chance to get on a license unless I should be at a facility for more than 3 months. If I cannot get on a license

- does this mean I cannot work at a facility doing brachytherapy? Some places are starting to ask if I have been on a license and I have to say no.
2. If a physicist is certified by the ABR or another recognized organization and has never been on a brachytherapy license, then is there a time limit for when they can get on the license?
 3. If a facility does brachytherapy and/or HDR and the physicist leaves, then does the facility have to stop doing these procedures? There are many one physicist facilities doing brachytherapy. If they must stop doing brachytherapy then this would diminish the quality of care the facility can give to the patient.
 4. Some states have licensing of medical physicist and others have registration to verify them as a qualified expert. Would the NRC create a similar registration program for qualified experts to do locum procedures in brachytherapy?
 5. Physicians working in radiation oncology, nuclear medicine and radiology can get permission to work on a license for up to 60 days with proper credentials and administrative approval. Will this same regulation apply to medical physicist? It can easily take up to 60 days to get someone on a license.

I would appreciate a response to the above items.

I have talked to some directors about work and some are concerned about being in compliance with the regulations. I also want to be in compliance with the regulations. However I would also like to be able to provide a service to help to keep their radiation oncology department fully functional.

Thank You

Sincerely



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