

**September 16, 2010**

Mr. Donald C. Jones, CEO  
Certification Board of Nuclear Endocrinology, Inc.  
Suite 200  
245 Riverside Avenue  
Jacksonville, FL 32202

Dear Mr. Jones,

Thank you for your letter of August 2, 2010, concerning the Nuclear Regulatory Commission's (NRC) review of the Certification Board of Nuclear Endocrinology, Inc., (the Board) application for NRC board recognition. As you stated, there have been numerous exchanges between NRC and your organization and extensive periods between reviews of your applications to be recognized as a certification board. We acknowledge that this process has been lengthy, but deficiencies persist in your application that prohibit the NRC from recognizing your board at this time. We request that you address the following issues and deficiencies so that we may move forward with your application.

The apparent subordination of the Board under the American College of Endocrinology, and the close interrelationship between the Board, the American Association for Clinical Endocrinologist, the American College of Endocrinology, and the Nuclear Medicine Training Program makes it difficult for the NRC to determine if your organization functions as a certifying board or simply wishes to move the Nuclear Medicine Training Program from the 10 CFR Part 35 training and experience alternate pathway for recognizing endocrinologists as authorized users. The Board should provide a clear and accurate description of the Board, the American College of Endocrinology, the American Association of Clinical Endocrinology, and the Nuclear Medicine Training Program that demonstrates that the Board and its certification process is independent and autonomous from these entities.

NRC considers your letter and attachment dated February 5, 2010, the most recent complete submission, because subsequent letters lack critical information included in the February 5, 2010 letter and their attachments appear to be copies of the February 5, 2010 attachment. The February 5, 2010 submission appears to provide conflicting information that makes our determination more difficult. Although it states the Board will review all candidates' didactic and work experience to ensure NRC requirements are met before the candidate is allowed to sit for the exam, there is no indication the Board meets before the examination to review qualifications. In fact, the Board's meeting procedures indicates the Board meets after completion of the board exam to determine if the applicant meets eligibility requirements for board certification,

completed the didactic education and laboratory work, necessary work experience and passed the exam. An explanation of this apparent discrepancy is necessary.

The application states that the Board consists of board certified individuals and remains independent from the American Association of Clinical Endocrinologist Board of Directors, American College of Endocrinology Board of Trustees, and program committee of the Nuclear Medicine Training Program. It also states that formation of the Certifying Board of Nuclear Endocrinology, as the governing body for the certification program, establishes the necessary firewall between the board certification examination and the preceptor training process. The application further states that members of the Board do not serve as faculty members of the Nuclear Medicine Training program or any other education program from which physicians may receive training they submit to the Board. However, three members listed as members of the Board of Nuclear Endocrinology are also listed as primary instructors in the Nuclear Medicine Training Program. An explanation of this apparent discrepancy is necessary.

The knowledge and competency being tested in radiation safety, radionuclide handling and quality control must include not only the mastery of the material in the didactic and laboratory training but also the mastery of the information and experience obtained during the supervised clinical work experience. The description of the board exam should clearly state that the examination will cover the supervised work experience for all sections requested as well as the didactic and laboratory training. The Nuclear Medicine Training program indicates the final examination will be given at a later date after the course is over. It is unclear whether this final examination and the certification examination are the same or different test. Please clarify whether these are separate test or not.

In addition to the specific discrepancies identified above, the Board should carefully review the February 5, 2010 letter and the attachment for inconsistencies and revise as appropriate.

Once NRC receives your resubmission, NRC staff, in accordance with our policy, will review the Board's submission with the Advisory Committee on the Medical Uses of Radioisotopes. If you have any questions or require additional information or clarification, please contact me at (301) 415-5422 or [Christian.Einberg@nrc.gov](mailto:Christian.Einberg@nrc.gov) or Donna-Beth Howe, Ph.D. of my staff at (301) 415-7848 or [Donna-Beth.Howe@nrc.gov](mailto:Donna-Beth.Howe@nrc.gov).

Sincerely,

*/RA/*

Christian E. Einberg, Chief  
Radioactive Materials Safety Branch  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials  
and Environmental Management Programs

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Radioactive Materials Safety Branch  
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OFC	RMSB	RMSB	RMSB	MSSA
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