

From: Zelac, Ronald
Sent: Thursday, December 09, 2010 3:45 PM
To: 'Kent Lambert'
Cc: Einberg, Christian; Fuller, Michael; Chidakel, Susan
Subject: RE: Part 35 Recognition of Certification Boards

Kent,

In the requirement, 10 CFR 35.50(a)(1)(i), the minimum of 20 college credits in science should be interpreted as only applying to applicants holding (and presenting) degrees in biological science.

Ron

From: Kent Lambert [<mailto:kent.lambert@drexel.edu>]
Sent: Tuesday, December 07, 2010 5:18 PM
To: Zelac, Ronald
Subject: Re: Part 35 Recognition of Certification Boards

Ron,

This raises a question (actually it raises many more, but this is the only one that I am prepared to ask at this time). In your response, you interpret the following requirement such that that the 20 college credits in physical science applies only to degrees in biological science.

"Hold a bachelor's or graduate degree from an accredited college or university in physical science or engineering or biological science with a minimum of 20 college credits in physical science"

This is how ABHP has interpreted the requirement as well, but without commas between the fields of study the phrase, "with a minimum of 20 college credits in physical science" could be interpreted as applying to each field of study. Please confirm that the NRC interprets 10 CFR 35.50(a)(1)(i) such that 20 college credits in physical science are required of applicants with degrees in biological sciences but that it does not apply to applicants with degrees in physical science or engineering.

Kent

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On 12/7/2010 11:59 AM, Zelac, Ronald wrote:
Kent,

The purpose of this e-mail is to formally convey to you the result of NRC's consideration of the question that you posed in your 9/8/10 e-mail to Cindy Flannery, below. I note that we discussed various aspects of this entire issue in a telecommunication on 10/28/10.

The short answer to your question is that, for purposes of conformity with the certification process recognition requirements in 10 CFR 35.50(a)(1), NRC does not consider that college credits earned in mathematics (or in engineering) can be used to satisfy the minimum of 20 college credits in physical science that an applicant for certification holding a degree in biology must have in order to be considered a candidate for certification.

In an e-mail dated 9/14/05 from Mohammad Saba, NRC staff, Mr. Saba pointed out that there was variance between the applicant requirements listed in the American Board of Health Physics' (ABHP's) application to NRC for recognition of its certification process under 10 CFR 35.50(a)(1) and the degree requirements for candidates listed in 10 CFR 35.50(a)(1)(i). In its response letter to NRC dated 10/12/05, addressing this issue and others noted in Mr. Saba's e-mail, ABHP indicated that its educational requirements for applicants seeking candidacy for the board's 2006 examination and for its future examinations had been changed to conform with the requirements in 10 CFR 35.50(a)(1)(i). Accordingly, this issue was no longer considered an impediment to recognition by NRC of the ABHP's certification process, and it was subsequently recognized. I should note that the ABHP's 10/12/05 letter did not indicate that "physical science" was being defined for purposes of its directions to/requirements for applicants to be anything different from its traditional definition (namely physics, chemistry, astronomy, and possibly geology).

In summary, NRC expects ABHP to utilize a traditional definition of "physical science" as it evaluates the qualifications of applicants for candidacy toward ABHP certification.

Any further questions that you or the ABHP may have about this issue can be directed to me.

Ron



From: Kent Lambert [<mailto:kent.lambert@drexel.edu>]
Sent: Wednesday, September 08, 2010 6:36 PM
To: Flannery, Cindy
Subject: Part 35 Recognition of Certification Boards

Hi Cindy,

I was asked as a member of the American Board of Health Physics what would appear on the surface to be a simple question. It is:

"For the purposes of certification, does mathematics qualify as a "physical science"?"

This is important because the requirement for the ABHP board to be recognized as qualifying for RSO positions at medical institutions is:

"Hold a bachelor's or graduate degree from an accredited college or university in physical science or engineering or biological science with a minimum of 20 college credits in physical science;" 10CFR35.50(a)(1)(i).

I understand that during a telephone conversation between the NRC and the ABHP (of which you were a party), The NRC stated that it considered mathematics to be a physical science.

Can you confirm that the NRC considers mathematics to be a physical science? Is there documentation for this interpretation that we can use to support our answer?

Thank you,

Kent Lambert
ABHP Parliamentarian

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