

May 12, 2011

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 February 11, 2011, responding to our September 16, 2010, letter. We have reviewed your responses and identified the following items that prevent us from recognizing your board at this time.

1. Your application indicates that the board will accept training obtained by taking the American Association of Clinical Endocrinology Nuclear Medicine Course. Please be aware that individuals completing the supervised work experience phase of the course may not meet the U.S. Nuclear Regulatory Commission (NRC) requirements you cite for the individual to be certified, and for NRC to recognize your board.

Specifically in Title 10 of the *Code of Federal Regulations* (10 CFR) 35.190 (c)(1)(ii)(B), NRC requires work experience “performing quality control procedures on instruments used to determine the activity of dosages and performing checks for proper operation of survey meters” and, in 10 CFR 35.190(c)(1)(ii)(C), NRC requires “calculating, measuring, and safely preparing patient or human research subject dosages.” NRC has identical requirements in 10 CFR 35.392(c)(2) and 10 CFR 35.394(c)(2). The Nuclear Medicine Course indicates the individual has to perform the daily constancy on the dose calibrator, “if applicable,” and the activity of each dose shall be measured in the dose calibrator, “if one is available,” and does not address other required quality control procedures. Nationally recognized standards include linearity, accuracy and geometry quality control procedures.

How will you determine if the individual has completed all of these requirements? This is especially important because your application indicates that individuals taking the Nuclear Medicine Course cannot get documentation of successfully completing either part of the course until after they have passed the Board Examination and a preceptor statement that the work experience as described in the Nuclear Medicine Course was completed does not indicate that the dose calibrator quality control procedures were performed or that it was used to measure dosages.

2. In 2009, NRC revised its requirements in 10 CFR 35.190, 35.392, and 35.394 to clarify that NRC permits grandfathered authorized users to provide the supervised work experience in these sections. The Board’s and the Nuclear Medicine Course’s failure to use the current language in the regulations restricts the authorized users supervising the work experience to only those individuals that are authorized users because they meet the current requirements in 10 CFR 35.190, 35.392, and 35.394. This restriction means

that the board must determine that each supervising authorized user meets the requirements 10 CFR 35.190, 35.392, and 35.394 to be an authorized user. If this is not the intent of the board, it should revise its requirements to match those of the current rule.

3. Your letter indicates that individuals may take one of four paths that will meet NRC's requirements to recognize your board, i.e., recognition under 10 CFR 35.190, recognition under 10 CFR 35.392, recognition under 10 CFR 35.394, and combined recognition under all three parts of the regulation. Please provide NRC with a sample board certificate for each of these pathways. Each sample certificate must be identical to the certificates your board will issue and should have a predominant watermark identifying the certificate as a "sample" or "not valid" so it cannot be easily replicated from the web site.

Once NRC recognizes a board, staff monitors the information the board provides to its candidates to ensure the commitments that form the basis for the recognition remain in effect. Staff usually monitors public web sites for this information. The staff has been unable to find information on your Board requirements or the Nuclear Medicine Course on the web. Can you provide information on where this information is or will be located?

If you have any questions or require additional information or clarification, please contact Michael Fuller, Team Leader, Medical Radiation Safety Team, at (301) 415-5020 or [Michael.Fuller@nrc.gov](mailto:Michael.Fuller@nrc.gov), or me at (301) 415-5422 or [Christian.Einberg@nrc.gov](mailto:Christian.Einberg@nrc.gov).

*/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

that the board must determine that each supervising authorized user meets the requirements 10 CFR 35.190, 35.392, and 35.394 to be an authorized user. If this is not the intent of the board, it should revise its requirements to match those of the current rule.

- 3. Your letter indicates that individuals may take one of four paths that will meet NRC's requirements to recognize your board, i.e., recognition under 10 CFR 35.190, recognition under 10 CFR 35.392, recognition under 10 CFR 35.394, and combined recognition under all three parts of the regulation. Please provide NRC with a sample board certificate for each of these pathways. Each sample certificate must be identical to the certificates your board will issue and should have a predominant watermark identifying the certificate as a "sample" or "not valid" so it cannot be easily replicated from the web site.

Once NRC recognizes a board, staff monitors the information the board provides to its candidates to ensure the commitments that form the basis for the recognition remain in effect. Staff usually monitors public web sites for this information. The staff has been unable to find information on your Board requirements or the Nuclear Medicine Course on the web. Can you provide information on where this information is or will be located?

If you have any questions or require additional information or clarification, please contact Michael Fuller, Team Leader, Medical Radiation Safety Team, at (301) 415-5020 or [Michael.Fuller@nrc.gov](mailto:Michael.Fuller@nrc.gov), or me at (301) 415-5422 or [Christian.Einberg@nrc.gov](mailto:Christian.Einberg@nrc.gov).

*/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

**DISTRIBUTION:** MSSA r/f

**ML111160011**

|               |           |           |           |
|---------------|-----------|-----------|-----------|
| <b>OFFICE</b> | FSME/MSSA | FSME/MSSA | FSME/MSSA |
| <b>NAME</b>   | DBHowe    | MFuller   | CEinberg  |
| <b>DATE</b>   | 5/6/11    | 5/10/11   | 5/12/11   |

**OFFICIAL RECORD COPY**