



Topic 2

Relaxation of Preceptor Attestation Requirements and Extending Grandfathering to Certain Certified Individuals (Ritenour Petition)

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Acronyms

- **ACMUI – Advisory Committee on Medical Uses of Isotopes**
- **PRM – Petition for Rule Making**
- **RSO – Radiation Safety Officer**
- **SECY- Office of the Secretary**
- **SRM- Staff Requirements Memorandum**
- **T&E – Training and Experience**

Background

- **Part 35 revised in its entirety in 2002**
- **Training and Experience (T&E) regulations finalized 2005**
- **Attestations are required for all applicants**

Background

- **Currently attestation is required under both:**
 - **Certification pathway**
 - **Alternate pathway**
- **Prior to 2005 attestation not required for certification pathway**

Proposed Relaxation of Preceptor Attestation

- **ACMUI proposed:**
 - **eliminate for all board-certified individuals**
 - **revise attestation wording**
 - **allow Residency program Directors to provide attestations**

Proposed Relaxation of Preceptor Attestation

- **In SECY-08-0179, based on ACMUI recommendations, the staff proposed revisions to attestation requirements**
- **In SRM-SECY-08-0179, the Commission approved the staff recommendations**

Ritenour Petition (PRM-35-20)

Background

- **3 pathways to be authorized:**
 - **Certification pathway**
 - **Alternate pathway**
 - ***Identified on an NRC or Agreement State license (petitioner referred to it as the “grandfathered” pathway)***

Petitioner's Concerns

- **2005 T&E regulations have inadvertently affected a group of board-certified professionals**
- **These individuals must now apply through the “alternate” pathway**
- **Alternate pathway for these board-certified persons places an undue burden and could result in a shortage of AMPs and RSOs**

Ritenour Petition (PRM-35-20)

- **Petitioner requested amendment of T&E requirements for experienced AMPs and RSOs**
- **NRC resolved the petition in 2008 concluding that the 2005 revision may have adversely affected some board-certified professionals**

Topic 2 Discussion Point

- **The basis for resolving the Ritenour petition was that an attestation would be provided for “grandfathered” individuals**
- **However, removal of the attestation requirement for all board-certified individuals is under consideration**