

NRC Part 35 Workshop - Houston

Topic 2 Panel

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

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August 2011

Questions for Discussion

Should the NRC eliminate the attestation requirement for individuals seeking authorized status via the board certification pathway? For recognized boards? Regardless of date of NRC recognition of board? For grandfathered individuals?

ACMUI (6/12/07) - NRC staff should remove the attestation requirement for board certified individuals

Questions for Discussion

ACMUI (6/12/07 & 8/16/07) - NRC staff should revise the regulations so that board certified individuals, who were certified prior to the effective date of recognition or were certified by previously recognized boards listed in Subpart J of the previous editions of Part 35, are grandfathered.

ACMUI (4/12/11) - ACMUI recommends to eliminate the written attestation for board certification pathway, regardless of date of certification.

Questions for Discussion

For the alternate pathway, should attestation requirement be retained? Attestation by whom? Language of attestation?

Yes

ACMUI (6/12/07) - NRC staff should rewrite the attestation requirement for individuals seeking authorization under the alternate pathway. The rewritten attestation should not include the word “competency” but should instead read “has met the training and experience requirements.”

Questions for Discussion

ACMUI (4/12/11) – ACMUI recommends the attestation to be revised to say “has received the requisite training and experience in order to fulfill the radiation safety duties required by the licensee.”

ACMUI (4/12/11) – ACMUI supports the statement that residency program directors can sign attestation letters, representing consensus of residency program faculties, if at least one member of the faculty is an authorized user (AU) in the same category as that designated by the applicant seeking authorized status, and that AU did not disagree with the approval.