

**From:** Gabriel, Sandra  
**To:** [Erin Maulsby \(erin@aobr.net\)](mailto:Erin.Maulsby@erin@aobr.net)  
**Subject:** Request for additional information from AOBR regarding request to recognize certification process under the requirements of 10 CFR 35.394  
**Date:** Tuesday, August 27, 2013 11:00:00 AM

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August 27, 2013

Erin Maulsby, Director of Certification Services  
American Board of Osteopathic Radiology (AOBR)  
119 East Second Street  
Milan, MO 63556-1331

Dear Ms. Maulsby:

This is to follow up to our telephone conversation yesterday regarding the AOBR's request for recognition by the NRC of its board certification process in Diagnostic Radiology under the requirements of 10 CFR 35.394 -- Training for oral administration of sodium iodide I-131 requiring a written directive in quantities greater than 1.22 gigabecquerels (33 millicuries). As discussed, several additional pieces of information are needed in order for the NRC to approve this request. Each item below briefly states the issue, then specifies in bold the information to be provided:

- 1) 10 CFR 35.394(c)(1)(iii) requires 80 hours of classroom and laboratory training including, in part, *mathematics pertaining to the use and measurement of radioactivity*. The excerpt the AOBR provided from Article V, Section B.5.4c of the Basic Standards for Residency Training in Diagnostic Radiology-American Osteopathic Association and American Osteopathic College of Radiology, effective July 12, 2012, describes topics to be included in 80 hours of classroom and laboratory training. The list of topics does not appear to include *mathematics pertaining to the use and measurement of radioactivity*. However, in previous correspondence with the NRC regarding recognition of your board certification process under 10 CFR 35.290 and 35.392, the AOBR committed to include training in *mathematics pertaining to the use and measurement of radioactivity* (see the letter from Pamela A. Smith of AOBR to Thomas H. Essig of NRC, dated June 23, 2006). In addition, the current description on the AOBR website at <http://aocr.org/associations/12322/files/NRC%20DR%20Website%204-19-2013.pdf> of requirements for candidates seeking certification in Diagnostic Radiology appears to include this topic.

**Please confirm that the AOBR requirements for certification in Diagnostic Radiology have continuously included since July 1, 2000, and will continue to include, training in *mathematics pertaining to the use and measurement of radioactivity*.**

- 2) 10 CFR 35.394(c)(2) requires work experience to be supervised by an authorized user (AU) who meets the requirements in 10 CFR 35.57, 35.390, or 35.394, or equivalent Agreement State requirements. The current request from the AOBR is more restrictive, in that it does not include supervision by AUs who meet the requirements in 10 CFR 35.57. This appears to be inconsistent with the current description on the AOBR website at

<http://aocr.org/associations/12322/files/NRC%20DR%20Website%204-19-2013.pdf> of requirements for candidates seeking certification in Diagnostic Radiology, which allows supervision by AUs who meet the requirements in 10 CFR 35.57. 10 CFR 35.57 is the section of the regulations that allows a physician that met previous AU requirements to continue to be an AU for that use without having to meet the current requirements. Omitting supervision by AUs who meet the requirements in 10 CFR 35.57 means that all supervising AUs must meet the current AU requirements.

**Please clarify whether the AOB requirements for certification in Diagnostic Radiology allow work experience under 10 CFR 35.394(c)(2) to be supervised by an authorized user who meets the requirements of 10 CFR 35.57.**

- 3) 10 CFR 35.394(c)(3) requires a written attestation that the individual has satisfactorily completed the requirements of 10 CFR 35.394(c)(1) and (c)(2) and has achieved a level of competency sufficient to function independently as an authorized user for medical uses under 35.300. The attestation must be signed by a preceptor authorized user who meets certain requirements. The current request from the AOB does not appear to address this requirement. However, the current description on the AOB website at <http://aocr.org/associations/12322/files/NRC%20DR%20Website%204-19-2013.pdf> of requirements for candidates seeking certification in Diagnostic Radiology appears to include this requirement.

**Please confirm that the AOB requirements for certification in Diagnostic Radiology include obtaining a written preceptor attestation in accordance with the requirements of 10 CFR 35.394(c)(3).**

- 4) The NRC posts "Procedures for Recognizing Certification Process of Specialty Boards" on its web site at <http://www.nrc.gov/materials/miau/med-use-toolkit/certif-process-boards.html>). This document states "If the specialty board posts its requirements for certification on the World Wide Web, the board should also provide the web site designation (URL)." The AOB's request states "Information may be viewed at [www.aocr.org](http://www.aocr.org) and click on the AOB tab. It does not specify the exact web site designation(s) of the requirements to allow the NRC to monitor any changes in the requirements.

**Please confirm that the specific web site designation for AOB's requirements for the certification examination in Diagnostic Radiology is <http://www.aocr.org/displaycommon.cfm?an=1&subarticlenbr=43>, including the embedded links to <http://www.osteopathic.org/inside-aoa/accreditation/postdoctoral-training-approval/postdoctoral-training-standards/Pages/radiology.aspx> and <http://aocr.org/associations/12322/files/NRC%20DR%20Website%204-19-2013.pdf>.**

- 5) The NRC "Procedures for Recognizing Certification Process of Specialty Boards" ask for the board to specify the length of time for which a certification is valid. The current request from the AOB states that certificates are time-limited, but does not specify the time limitation.

**Please provide the length of time for which an AOBR certification in Diagnostic Radiology is valid.**

- 6) The NRC now posts on its web site copies of sample certificates for recognized board certification processes for each recognized time frame. For all recognized boards except AOBR, the sample certificates can be viewed from the links on the web page at <http://www.nrc.gov/materials/miau/med-use-toolkit/spec-board-cert.html>. This allows licensees and regulators to confirm the expected appearance of a certificate.

**Please provide copies of sample AOBR certificates for Diagnostic Radiology for two date ranges: (a) July 1, 2000 to June 30, 2012, and (b) July 1, 2012 to present. For completeness, you may also provide a copy of a sample AOBR certificate for Radiation Oncology for the date range May 1, 2007 to present. The sample certificates should include fictional name and date information, with a watermark stating "Not Valid."**

- 7) During our telephone conversation, you noted that Pamela Smith, Executive Director of AOBR, has retired and that you have been designated as the contact for communications with the NRC. The NRC "Procedures for Recognizing Certification Process of Specialty Boards" state that all communications to the NRC from a specialty board are to be signed by a person authorized to speak for the board.

**If you plan to sign letters on behalf of the AOBR, please provide signed documentation on AOBR letterhead that the board has authorized you to speak for them.**

The NRC will continue review of the AOBR's request upon receipt of the AOBR's official response to the issues listed above. The AOBR should respond by formal letter signed by a person authorized to speak for the board. The letter should acknowledge the board's commitments to and responsibility for the completeness and accuracy of the information provided to the NRC. Please mail the letter to:

Director  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials and Environmental Management Programs  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attention: Chief, Radioactive Materials Safety Branch, Mail Stop T-8E24

For delivery services requiring a street address, mail to:

Director  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials and Environmental Management Programs  
U.S. Nuclear Regulatory Commission  
11545 Rockville Pike  
Rockville, MD 20852-2738  
Attention: Chief, Radioactive Materials Safety Branch, Mail Stop T-8E24

For further information or any questions, please contact me at (301) 801-3889 or [sandra.gabriel@nrc.gov](mailto:sandra.gabriel@nrc.gov). Please note that I typically work Tuesday through Thursday of each week and will be away during the week of September 2.

Thank you,  
Sandy Gabriel, Ph.D.  
Health Physicist  
NRC Medical Radiation Safety Team