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Training Requirements for Experienced Radiation Safety Officers and Authorized Medical Physicists

Comment On: NRC-2008-0175-0017

Medical Use of Byproduct Material - Medical Event Definitions, Training and Experience, and Clarifying Amendments

Document: NRC-2008-0175-DRAFT-0030

Comment on FR Doc # 2014-16753

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General Comment

Comments from Veterans Health Administration (VHA) submitted VHA National Health Physics Program

Docket ID NRC20080175

10 CFR Parts 30, 32, and 35

Medical Use of Byproduct Material Medical Event Definitions, Training and Experience, and Clarifying Amendments

Currently, 10CFR35 only allows for naming a single permeant Radiation Safety Officer (RSO) on a radioactive materials license. The Advisory Committee on the Medical Uses of Isotopes (ACMUI) has expressed concerns that the single RSO per radioactive materials license contributes to the shortage of available RSOs to server as preceptors for prospective RSOs. However, the problem is larger than a shortage of RSOs to serve as preceptors. Presently, there is not a clearly defined pathway for individuals to become a RSO.

The Associate Radiation Safety Officer (ARSO) position proposed by the NRC does not create a new pathway for individuals to become a RSO. Under the proposed regulations the ARSO is required to meet the same training and experience requirements as a RSO for the tasks and duties the individual is authorized to perform independently.

The NRC should consider creating a new pathway for individuals to become a RSO via the proposed ARSO position. The NRC should allow an individual who meets the education requirements in 10CFR35.50 to be named as an ARSO on a license. The licensee would be required to submit an amendment to the NRC requesting the individual be named the ARSO on the license. The licensee's management would be required to appoint an ARSO who, in writing, agrees to be responsible for implementing the radiation protection program. The individual would be required to obtain one year of full time experience under the supervision of the RSO in the areas outlined in 10CFR35.50. The RSO will fulfill the preceptor requirements by assessing the performance of the ARSO in each of the areas outlined in 10CFR35.50. As the ARSO demonstrates proficiency in each of the respective areas, the RSO would have the ability to grant authorization to the ARSO to work independently in those areas where proficiency has been demonstrated. The RSO as the preceptor would be required to document the proficiency in each area for the ARSO. After the one year training period has been completed, the ARSO would be able to perform the same functions as the RSO. By creating the ARSO pathway for training RSO, would create a formal training program for individuals to become a RSO and it would also increase the number of individuals available to be preceptors.

Attachments

NHPP comments regarding the proposed changes to part 35 10 November 2014

Comments from Veterans Health Administration (VHA) submitted VHA National Health Physics Program

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10 CFR Parts 30, 32, and 35

Medical Use of Byproduct Material— Medical Event Definitions, Training and Experience, and Clarifying Amendments

e-mail comments to Rulemaking.Comments@nrc.gov

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