

April 25, 2017

Daniel S. Collins, Director
Division of Material Safety, State, Tribal and Rulemaking Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001



Attention: Chief, Radioactive Materials Safety Branch, Mail Stop T-8E18

Re: Certification Board of Nuclear Cardiology (CBNC); NRC Request for Additional Information Regarding Changes in the Organization and the Re-Recognition of its Specialty Board Program

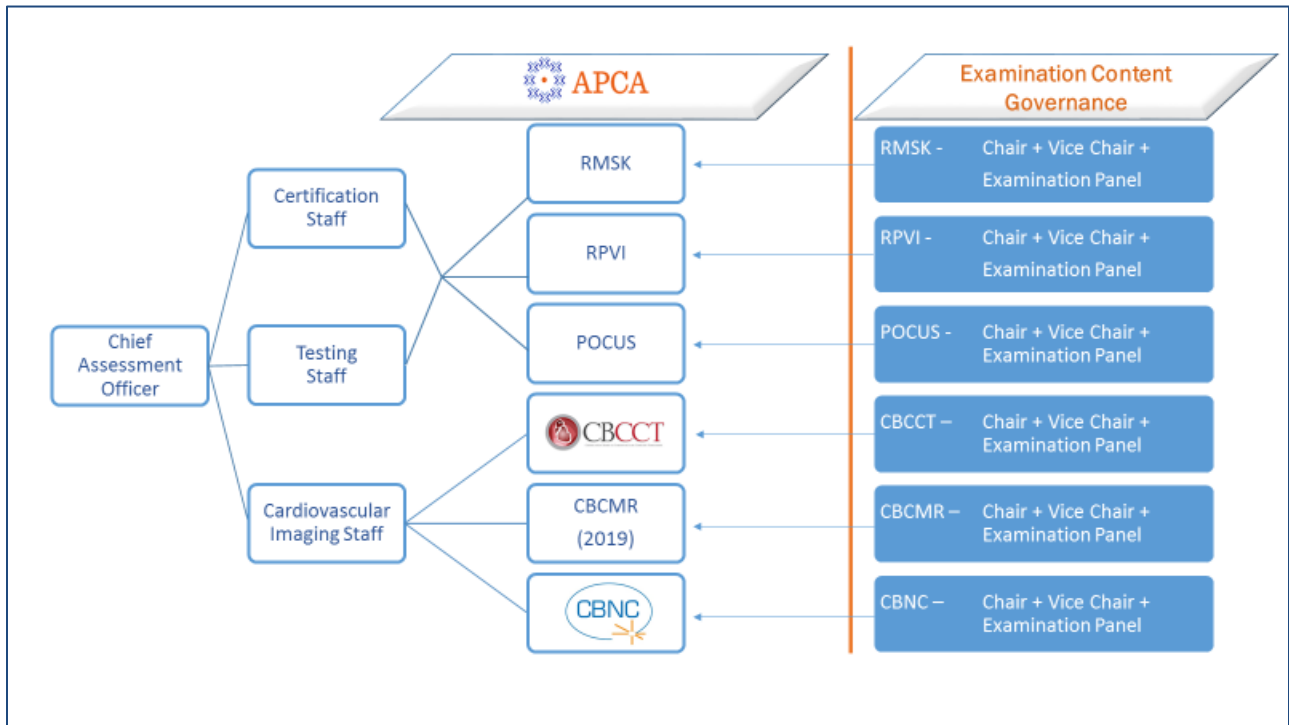
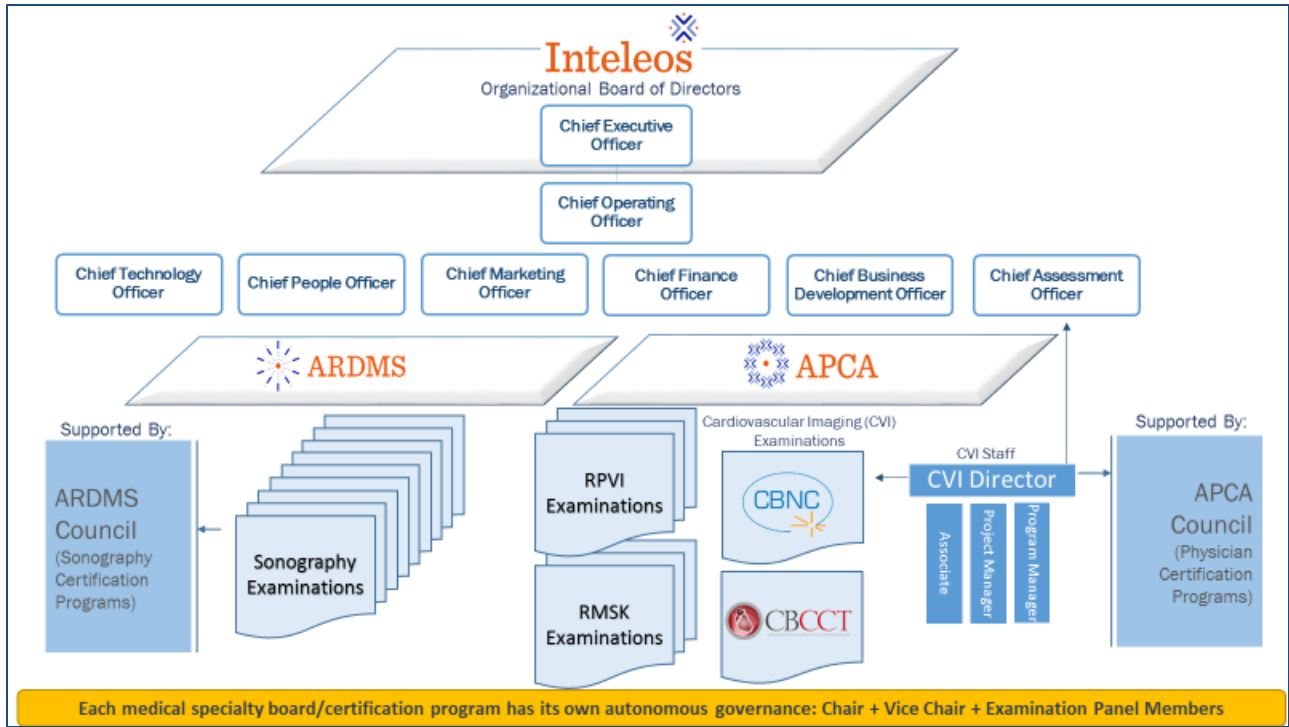
Dear Mr. Collins,

I am writing to you in my capacity as Chairman of the Board of Inteleos in connection with the Nuclear Regulatory Commission's (NRC's) consideration of the request by the Certification Board of Nuclear Cardiology (CBNC) for re-recognition of its certification program.

Thank you for the Wednesday, April 19, 2017, Inteleos/CBNC meeting with you and other members of the NRC Division of Material Safety, State, Tribal, and Rulemaking Programs. Dr. Thomas Holly (CBNC Chairman) and the Inteleos staff were very gratified by the thoughtful and informative exchange. I also appreciate this opportunity to respond to questions raised at the conclusion of that meeting.

Inteleos is a newly formed umbrella organization for certifying programs for health care professionals, such as the CBNC certification program. While CBNC is housed under Inteleos' Alliance for Physician Certification and Advancement (APCA), APCA's oversight role is limited to supporting its member certification programs and to assuring that their programmatic policies and procedures have been followed. Accordingly, CBNC's physician leadership, all of whom are CBNC diplomates, independently control the program's eligibility requirements, examination content, passing standards, and re-certification program. Neither APCA nor Inteleos itself has the authority to countermand a programmatic decision of the CBNC diplomate leadership.

In response to a question raised during the April 19th meeting, I know of no change to the procedures and processes used by the CBNC Subject Matter Expert diplomate leaders and Cardiovascular Imaging (CVI) staff in the administration, management, direction and oversight of the CBNC examination program. These procedures and processes are in all substantive ways equivalent to those in practice prior to CBNC's 2012 merger into CCCVI, as well as throughout the period when CBNC was under the CCCVI structure, and now continue under the Inteleos umbrella. The following charts will illustrate the governance structure of Inteleos, APCA and CBNC as well as highlight the roles of the dedicated staff who transitioned from CCCVI to Inteleos and who now comprise the cardiovascular imaging (CVI) department. These CVI staff are responsible for carrying out the CBNC leadership directives of the CBNC certification program.



I would like to state that nothing in this letter or in any of the communications from CBNC or Inteleos relative to CBNC's recognition request is proprietary or confidential.

On behalf of the CBNC leadership and our Inteleos/CVI staff, we hope that the information provided in this letter and during the recent meeting have assured NRC staff of the autonomy of CBNC's diplomate leadership of its certification program, of CBNC's dedication to its valued collaboration with NRC and of Inteleos' and APCA's commitment to support these endeavors. We eagerly and optimistically await NRC's re-recognition of the CBNC program, so please do not hesitate to let me or our staff know if we can be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Shipp', written in a cursive style.

Thomas D Shipp, MD
Chairman, Inteleos Board of Directors

Cc: Thomas Holly, MD, Chair, CBNC
Dawn Edgerton, Director Cardiovascular Imaging Services
Bill Seifarth, Chief Assessment Officer
Dale Cyr, Chief Executive Officer