



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 15, 2018

Dr. Gerald Tobias
9933 East Jenan Drive
Scottsdale, AZ 85260

Dear Dr. Tobias:

I am writing in response to your letters to the U.S. Nuclear Regulatory Commission (NRC) Chairman, Kristine Svinicki. The NRC has a published medical policy statement (65 *Federal Register* Notice 47654, August 2000) which provides the NRC's general intentions in regulating the medical use of byproduct material. This medical policy states: 1) The NRC will continue to regulate the uses of radionuclides in medicine, as necessary, to provide for the radiation safety of workers and the general public. 2) The NRC will not intrude into medical judgments affecting patients, except as necessary, to provide for the radiation safety of workers and the general public. 3) The NRC will, when justified by the risk to patients, regulate the radiation safety of patients primarily to assure the use of radionuclides is in accordance with the physician's directions. 4) The NRC, in developing a specific regulatory approach, will consider industry and professional standards that define acceptable approaches of achieving radiation safety. As physicians' communications with patients are medical judgements which affect patients, it is NRC's policy not to dictate or intrude in them.

However, as it is NRC policy to regulate the radiation safety of patients primarily to assure the use of radionuclides is in accordance with the physician's directions, the NRC requires physicians to have training in radiation safety aspects prior to being able to administer byproduct material to humans. Specifically, Title 10 of the *Code of Federal Regulations* Part 35.290 requires all physicians who administer for imaging and localization procedures, such as a nuclear stress test, to complete a minimum of 700 hours of training and experience in basic radionuclide handling techniques and radiation safety applicable to the medical use of unsealed byproduct material for imaging and localization studies. This training must include training in radiation biology and experience in calculating, measuring, and safely preparing patient or human research subject dosages.

You may find information on radiation doses from diagnostic procedures from a number of professional societies and organizations, such as the Health Physics Society, American College of Radiology, and the National Council on Radiation Protection and Measurements, among many other sources.

If you have any further questions or concerns, please feel free to contact me by e-mail at Douglas.Bollock@nrc.gov, or by phone at (301) 415-6609.

Sincerely,

/RA/

Douglas Bollock, Chief
Medical Safety and Events Assessment Branch
Division of Materials Safety, Security, State,
and Tribal Programs
Office of Nuclear Material Safety
and Security

SUBJECT: RESPONSE LETTER TO DR. GERALD TOBIAS.
DATED: _____.

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NAME	DBollock
DATE	5/15/18

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