

The NRC is Seeking Input on its Evaluation of Training and Experience for Authorized Users



Training and Experience Requirements

The NRC's training and experience (T&E) requirements in Subpart E of Title 10 of the *Code of Federal Regulations* Part 35 provide three ways that a physician can be authorized to administer unsealed byproduct materials or radiopharmaceuticals requiring a written directive:

- 1) A physician can be certified by a medical specialty board, whose certification process is recognized by the NRC or an Agreement State.
- 2) A physician can complete a structured educational program and supervised work experience under an **alternate pathway**. The required 700 hours breaks down to a minimum of 200 hours of classroom and laboratory training, and 500 hours of supervised work experience.
- 3) A physician can be authorized if previously identified as an authorized user on an NRC or Agreement State license or permit (i.e., grandfathered).

The NRC T&E requirements describe the minimum training for physicians to safely use radioactive materials – protecting themselves, coworkers, patients, the public, and the environment. The NRC issues licenses to medical facilities and not specifically to individual physicians (physicians are listed as AUs on a license).

The NRC does not license physicians.

The NRC is Evaluating the Alternate Pathway T&E Requirements

Should the NRC establish tailored T&E requirements for different categories of

radiopharmaceuticals?

If so, how should those categories be determined (such as by risks posed by groups of radionuclides or by delivery method)?

What would the appropriate T&E requirements be for each category?

Should those requirements be based on hours of T&E or focused more on competency?

How Can You Share Your Input on the T&E Requirements?

- Submit a written comment on www.Regulations.gov – search for Docket ID NRC-2018-0230 and click on “Comment Now!”
The deadline to submit comments is January 29, 2019.
- Participate in NRC's final public comment webinar scheduled for Tuesday, January 22, 2019, at 10:00 a.m. EST. Participation details are available at <https://www.nrc.gov/pmns/mtg>
- Visit the NRC's T&E evaluation Web site to stay updated on the evaluation and public participation opportunities: www.nrc.gov/materials/miau/med-use-toolkit/training-experience-evaluation.html