

ACNP

1101 Connecticut Avenue, N.W. • Suite 700 • Washington, D.C. 20036

(202) 429-5120

Fax (202) 223-4579

SNMThe Society
of Nuclear
MedicineAmerican
College of
Nuclear
Physicians

December 29, 1993

The Honorable Ivan Selin
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Chairman Selin:

The American College of Nuclear Physicians (ACNP) and the Society of Nuclear Medicine (SNM) are deeply concerned that NRC's minimum requirements for physicians to use unsealed sources of byproduct material for therapeutic purposes are inadequate for patient care and public safety. These minimum requirements are extremely troubling to the members of ACNP and SNM and we wish to register our concern in the strongest possible way.

ACNP and SNM are composed of 15,000 physicians, pharmacists, scientists, and technologists involved in the delivery of healthcare services in Nuclear Medicine. Last year, radioactive pharmaceuticals were administered to 11,700,000 patients for diagnostic and therapeutic purposes, and approximately 90,000,000 laboratory analyses were performed with radioactive agents on patient body fluids and tissues.

Your current policy is producing a dangerous distribution of therapeutic radiopharmaceuticals to physicians who are inadequately qualified. Patients are therefore unknowingly served by hospitals with incomplete nuclear medicine services and may be denied access to important procedures.

In 1954 when the Atomic Energy Act was passed, Nuclear Medicine consisted of a few procedures. Due to rapid progress and world leadership in the development of our field, in 1971 Nuclear Medicine evolved into a separate, board certifiable medical specialty. The NRC (then AEC) only required two weeks training for a physician to use the limited radiopharmaceuticals of the time and for the limited therapy applications which had developed. Forty years later, NRC still has its two week (80 hour) requirement minimum for radiopharmaceutical therapy, while the requirement for eligibility to take the specialty board examination in Nuclear Medicine is a two year residency or a one year requirement for Nuclear Radiology in an American Council for Graduate Medical Education (ACGME)-approved program. The latter requirement also entails a six month rotation in Nuclear Medicine during an ACGME approved Diagnostic Radiology residency.

The general availability of a new therapeutic radiopharmaceutical raises some concerns if the incompletely trained and unqualified physicians are to be permitted to receive, dispense and dispose of the material. Strontium-89 Chloride (Metastron®) has more than the usual patient and public safety implications, yet no re-examination of NRC's inadequate physician educational requirements has occurred. This drug is useful for the palliation of severe pain from widespread bone metastases of cancers such as prostate and breast. Sr-89 is the only long-lived radionuclide presently used in clinical Nuclear Medicine in sufficient strength to require availability of a Low Level Radioactive Waste (LLRW) site or a long-term (at least 1½ years) on-site storage facility. The physicians who should be entrusted with the use of Metastron® are those who not only understand the extensive basic radiation sciences necessary to prescribe and administer the drug safely, but understand the relevant aspects of LLRW storage, treatment, and disposal as well. ACNP and SNM are concerned that mistakes will occur because poorly qualified physicians, who nevertheless meet your minimum requirements, are licensed to use Metastron®.

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PDR COMMS NRCC
CORRESPONDENCE PDR

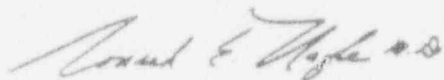
Attached is an advertisement which promotes a training program which meets your requirements in 9 days and which we feel is inadequate training for a Nuclear Medicine professional. Unfortunately, these courses have already begun. Unless the NRC takes the immediate and forceful initiative to put a stop to these superficial courses, the safety of the patients and the public will be threatened by the approval of hundreds of inadequately trained, poorly qualified individuals the NRC will approve to receive, store, dispense, and dispose of long-lived, radioactive materials.

We urge you not to put this problem to your Medical Section. They are not, in our opinion, qualified to respond appropriately. There is not now, nor has there ever been, a physician, let alone a Nuclear Medicine physician, in the full-time, permanent employ of NRC. One temporary "Visiting Medical Fellow" has been at NRC for two years. Dr. Polycove is indeed qualified to address this problem, but the assortment of technologists and mainly physical scientists comprising the Medical Section have no medical or radiopharmaceutical qualifications to appreciate the necessary qualifications for physicians to use unsealed sources safely for patient therapy.

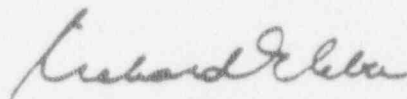
We strongly urge you to consult with us and with your Advisory Committee on Medical Uses of Isotopes (ACMUI). This body has been urging progress in NRC's physician requirements for many years. NRC's Advanced Notice of Proposed Rulemaking (ANPR) of 1989, has been under examination for 4 1/2 years. NRC's Medical Management Plan, Sept. 1993, pledges a review of physician qualifications by 1996. At this point, we believe that it would be more appropriate for this decision to be made as soon as possible. As always, we stand ready to cooperate fully to assist the NRC in defining acceptable medical and educational based criteria for NRC licensure.

Please contact Mr. David Nichols in our Government Relations Office (202) 429-5120 for further information or meeting arrangements.

Sincerely,



Conrad E. Nagle, M.D.
President
American College of Nuclear Physicians



Richard C. Reba, M.D.
President
Society of Nuclear Medicine

Enclosure

CEN/RCR:dn



October 1993

Dear CRCPD member,

The enclosed information describes our Basics of Radioisotope Handling (BRIH) program, and a version of this program directed to Oncologists. Please note that the BRIH program is fully ACCREDITED, BONDED, CERTIFIED, and APPROVED.

University credit, as well as other documentation, is available for these programs. The BRIH programs are approved by an agency recognized by the United States Department of Education.

If you have any questions about these programs or Nuclear Consulting Systems, please call our office at 1-800-548-4024.

1018 MKTG 10/93

Other Services

Nuclear Consulting Systems also provides other unique services that may be of significant value to Radiology, Nuclear Medicine, Cardiology, Oncology and other imaging facilities. These services include, but are not limited to;

Financial

Proforma, financing, lease and customer analysis for cost containment and revenue enhancement

Management

Patient flow, time-performance, policies, procedures, job descriptions and training

Marketing

Patient and physician awareness, joint ventures, safe harbors, programs, and materials

Organizational Development

Facility analysis and strategic planning for organization, re-organization, and / or expansion of facilities and practices.

Other services are available to assist you in addressing your specific needs. Our expertise in capital equipment, safety, personnel, management, and operations provide a variety of talents and skills that may be focused on your medical needs. Contact our office to discuss your specific projects with our professional staff.

1127 MKTG 8/93



NC SYSTEMS, INC.
NATIONAL HEADQUARTERS AND LABORATORIES
5171 ELDORADO SPRINGS DRIVE
BOULDER, COLORADO 80303

NUCLEAR CONSULTING SYSTEMS

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FOR
RADIOLOGIC AND MEDICAL IMAGING

RADIOLOGY
AND
NUCLEAR MEDICINE

- CARDIOLOGY
- ONCOLOGY

SPECIAL PROCEDURES
AND RADIATION THERAPY

BONDED • INSURED • LICENSED
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ALL OF YOUR CONSULTATION NEEDS

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5171 ELDORADO SPRINGS DRIVE
BOULDER, COLORADO 80303
1-800-548-4024

Health Physics, Radiation Safety

Our trained and certified staff will review and/or manage all aspects of your radiation safety program. Working in cooperation with the licensee, Radiation Safety Officer (RSO) and regulatory agencies for:

- Spill, Contamination, Exposure and Incident Reports
- Review Operational Data
- Standard and Special Exposures
- Leak, Wipe and Contamination Analysis
- Instruct Personnel Safety Programs
- Facility Design

Regulatory Compliance

On-site visits, review of all records and compliance systems, to address the regulations of the NRC, Agreement States, OSHA, FDA, DOL, AMH, and other agencies. Licenses, licence amendments, mock inspections and inspection preparation include:

- Exposure/Contamination Records
- Inventory Review
- Machine/Device Calibration
- Personnel Education
- Regulatory Updates
- Personnel Instruction

Quality Control and Assurance

On-site, and telephone/computer-modem consultation in establishment and implementation of QA and QC procedures. These activities will assist in compliance, provide study reproducibility and enhance diagnostic accuracy. Assistance includes but is not limited to:

- Gamma Cameras
- Survey Meters
- Computers
- Dose Calibrators
- Imagers
- Radiographic and Special Procedures

Calibration and Analysis

NC Systems operates a licensed calibration facility. This facility provides full compliance calibration of survey meters and related devices. Analytical sample measurement includes contamination leak and wipe testing samples, as well as environmental and biological samples.

- "Loaner" Survey Meters
- Meter Repair and Calibration
- Sample Analysis
- Special Projects
- Check Sources
- Calibration Sources

Continuing Education

NC Systems and its affiliate, the Institute for Nuclear Medical Education (INME), provides a variety of approved, licensed, and certified educational programs for professional and technical personnel. These programs range in duration from one day to 18 (or more) days of intense, relevant, instruction including:

- Radiation Safety and Compliance
- Nuclear Medical Physics
- Radiation Instrumentation
- Radiopharmaceuticals
- Management
- Nuclear Cardiology
- Quality Control and Compliance
- Nuclear Oncology

Licensing Assistance

NC Systems has nearly 100 years of combined staff experience in licensing. We will assist in the completion of new licenses, license amendments, ministerial changes and related documentation. Assistance in areas of communication, and compliance is provided by our staff.

- Applications
- Operational Documents
- Amendments
- Inspection response
- Ministerial Changes
- Incident Compliance

Why Attend our Classes?

The Nuclear Regulatory Commission (NRC) and Agreement States has repeatedly accepted the Basics of Radioisotope Handling (BRIH) Program for licensure. Presented in four classes, BRIH meets or exceeds the didactic requirements of these agencies. When combined with proper Clinical Preceptorship/Clinical Experience, this program meets the requirements for licensure in nuclear imaging, including Nuclear Oncology.

Nuclear Licensing Agencies

The NRC is a Federal Agency, authorized by Congress to control radioactive by-product material by issuing licenses for possession. When mutually agreed, the NRC has relinquished its licensing authority to individual states ("Agreement States"). Each Agreement State has established its own entity to issue licenses. However, because their authority is granted at the federal level, all statutes of Agreement States must be substantially in accord with federal regulations. Thus, although different agencies issue licenses to possess radioactive materials, the qualifications for licensure are essentially uniform throughout the nation.

Physician Nuclear Licensing Requirements

To qualify for licensure to possess radioactive materials for diagnostic medical use, a physician needs to meet the following qualifications:

Level I, Radiation Therapy - Oncology

- Basics of Radioisotope Handling - 80 hours of didactic instruction (provided by our program).
- Clinical Preceptorship - Specific experience in the treatment of ten (10) individuals with the specific radioisotope therapy for which licensure is to be obtained.

Level II, Full Nuclear Medicine Licensure

- Basics of Radioisotope Handling - 200 hours of didactic instruction (provided by our program).
- Clinical Preceptorship—500 hours of physician-to-physician patient hours devoted to nuclear procedures.

1-800-548-4024

Instruction:

This program is formal and didactic, but it also provides demonstrations and hands-on techniques to offer practical understanding of the covered topics. Some classes may include out-of-classroom instruction at licensed calibration and leak testing facilities, radiopharmacies, and/or DOE nuclear weapons facilities.

Who May Participate:

Participants in BRIH include: physicians, pharmacists, experienced and inexperienced technologists, physicists, active administrators and regulatory personnel.

Credit Hours:

The Institute for Nuclear Medical Education has designed each of its four classes to provide 50 hours of training. The complete program offers a total of 200 contact hours. Portions of the 200 hour program are designed for all the participant to meet the 80 hour, therapy only, requirements with a minimum of scheduling changes. CEU units and undergraduate/graduate college credits are available for the entire 200 hours.

Schedule:

Classes are given at varying nationwide locations each month. Often, two classes are combined in a nine-day session (two weekends plus five weekdays) to minimize traveling expenses and time away from practice. For a complete list of class offerings, see the enclosed card. To inquire about tutorial offerings or individual instruction, contact our Program Coordinator at:

1-800-548-4024

Enrollment Deadlines:

Program enrollments will be accepted on a space-available basis. Special lodging arrangements are often available at the program's chosen hotel, but special rates usually end four weeks before the first day of class. Make arrangements to attend as early as possible.

Cancellation/Tuition Refund Policy:

Policies are in accord with the United States Department of Education standards. See the enclosed enrollment card for details.

Other Information Available Upon Request:

- Consultation - an evaluation of your needs for licensure
- NRC licensing requirements
- Establishing a Nuclear Oncology Facility
- Clinical Preceptorships - description, content and documentation
- Facility Design
- Management Services
- Equipment Selection

1077 DIME 8993

Basics of Radioisotope Handling Techniques (BRIH)

Curriculum Distribution

The distribution of subject matter for this 80 - 200 hour program has been determined by the requirements of the United States Nuclear Regulatory Commission and Agreement States. This program meets or exceeds the requirements for licensure in nuclear medicine and nuclear oncology.

The requirements of the NRC and Agreement States regarding classroom hour distribution have been used to design this program. The distribution is as follows:

LEVEL I

INME Class Title	III	IV	Total
<i>Regulatory Agency Category</i>			
Radiation Physics and Instrumentation	8	17	25
Radiation Protection	20	5	25
Mathematics	6	4	10
Radiation Biology	12	8	20
Total Hours			80

LEVEL II

INME Class Title	I	II	III	IV	Total
<i>Regulatory Agency Category</i>					
Radiation Physics and Instrumentation	39	31	8	22	100
Radiation Protection	2	4	20	4	30
Mathematics	5	6	6	3	20
Radiation Biology	2	3	12	3	20
Radiopharmaceuticals and Chemistry	2	6	4	18	30
Total Hours					200

Clinical Preceptorship Program:

Some physicians find that their experience in Nuclear Medicine or Nuclear Oncology is either inadequate, not specific enough for the procedures for which they wish to be licensed, or may be out-of-date. Contact our office for more information:

1-800-548-4024

Class Descriptions



I PRINCIPLES OF RADIATION

Length: 50+ hours in 4.5+ days

Objectives: To provide an understanding of currently accepted structure and methods of research into the nature of matter, to differentiate the types of radiation emissions and their characteristics, including interaction; to measure radiation from various sources using detection systems; to convert sources using detection

systems; to convert radiation measurements into appropriate activity, exposure, dose and biologically effective units; to discuss Federal/State regulatory requirements in relation to the medical use of radioactive materials and to demonstrate and participate in measurements of half value layers, half thickness, radioactive decay, inverse square law and particulate and electromagnetic energy



II MEDICAL RADIATION INSTRUMENTATION

Length: 50+ hours in 4.5+ days

Objectives: To identify the types and application of medical radiation detection systems available and their operational characteristics; to identify and demonstrate the theory of calibration techniques; and quality control procedures for G-M and ionization survey meters, dose calibrators,

scintillation probes, wells and cameras and medical computers; to calibrate and determine geometry and count rate efficiency of various detection systems; to convert radiation measurements into activity, exposure and dose units; to determine the clinical performance characteristics of gamma cameras and document professional and regulatory requirements



III MEDICAL RADIATION PROTECTION

Length: 50+ hours in 4.5+ days

Objectives: To provide an explanation of the biological effects of radiation on human cells, tissues and organs at chronic and acute levels; to identify the implications and remedial actions necessary in cases of acute and chronic contamination and exposure to radiation; to determine the operation and use of personal

dosimeters and protection/measuremant instruments; to establish an effective ALARA program; to determine and comply with Federal and State radiation safety regulations, including appropriate measurements and documentation; to establish and administer personnel and operational policies and procedures to ensure patient, worker, and population safety from unreasonable biological, mechanical, electrical, and radiation hazards



IV RADIOPHARMACEUTICALS AND CHEMISTRY

Length: 50+ hours in 4.5+ days

Objectives: To provide a discussion of the indications, contraindications, and pharmacological effects of radiopharmaceuticals and radiation sources; to identify the production of radiation sources and their regulatory control, specific activity and radionuclide purity; to explain and provide for

implementation of operational procedures for ordering, receiving, storage, and disposal of radioactive materials; to review the regulatory requirements for the development and use of radiopharmaceuticals; to calculate the activity, concentration, and radiation dose of diagnostic radiopharmaceuticals; to identify and demonstrate handling and administration techniques for radiopharmaceutical agents

Proven Academic Excellence

The Institute for Nuclear Medical Education and its Basics of Radioisotope Handling Program provides:

- Licensed and Certified Instructors
- 28+ Classes at Nationwide Locations
- Over 25 Years of Program Experience
- Licensed Physicians as Advisors
- CME, CEU and College/University Credit
- Proven Acceptance for Licensure

APPROVED SCHOOL

Certified as an Approved School and regulated by:
Department of Higher Education State of Colorado

ACCREDITED INSTITUTION

Accredited by a national accrediting agency listed by the U.S. Secretary of Education:
Accrediting Commission of the Accrediting Council for Continuing Education and Training (ACCET)

RECOMMENDED FOR UNDERGRADUATE AND GRADUATE CREDIT

Recommended for College/University credit for all courses by:

- American Council on Education (ACE)*
- recognized by the American Association for Collegiate Registrars Council Post-Secondary Education.*

LISTED

NRC Service Training and Information System

LICENSED

Holder of Radioactive Materials License

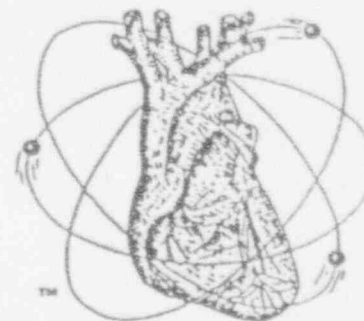
ACCEPTED BY

- NRC & Agreement States—Medical & RSO Licensure
- American Academy for Health Physics—200 Hours CEU
- American Pharmaceutical Association—NUSPEX
- Board of Medical Examiners—Nuclear Medical Technology
- International Association of Continuing Education and Training—CEU
- ... and other professional organizations

APPROVED • ACCREDITED VALIDATED

Educational Programs
for

NUCLEAR ONCOLOGY



BASICS OF RADIOISOTOPE HANDLING TWO PROGRAMS FOR LICENSURE

- LEVEL I *Radiation Therapy
Oncology - (80 hours)*
- LEVEL II *Full Nuclear Medicine
Including Oncology (200 hours)*

PERFORM NUCLEAR ONCOLOGY EXPAND YOUR PRACTICE

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**INSTITUTE FOR NUCLEAR
MEDICAL EDUCATION**

5171 ELDORADO SPRINGS DRIVE
BOULDER, COLORADO 80303

1-800-548-4024

1-303-499-4099

**BASICS OF RADIOISOTOPE HANDLING
PROGRAM SCHEDULE 1993-1994
and REGISTRATION CARD**
(see reverse side)

<u>Dates</u>	<u>Location</u>	<u>Classes</u>
Oct 16-24	Chicago, IL	III IV
Nov 3-21	Scottsdale, AZ	I II
Dec 11-19	Orlando, FL	III IV

Schedule for 1994		
<u>Dates</u>	<u>Location</u>	<u>Classes</u>
Jan 8 - 18	Secaucus, NJ (NYC area)	I II
Jan 29 - Feb 6	San Francisco, CA	III IV
Feb 26 - Mar 6	Chicago, IL	I II
Mar 19 - 27	New Orleans, LA	III IV
Apr 9 - 17	Boston, MA	I II
May 7 - 15	Secaucus, NJ (NYC area)	III IV
June 4 - 12	Orlando, FL	I II
July 9 - 17	San Antonio, TX	III IV
Jul 30 - Aug 7	Boulder, CO	I II
Aug 27 - Sep 4	Orlando, FL	III IV
Sept 24 - Oct 2	Philadelphia, PA	I II
Oct 22 - 30	Chicago, IL	III IV
Nov 5 - 13	San Antonio, TX	I II
Dec 3 - 11	Boulder, CO	III IV

- I Principles of Radiation Physics
- II Medical Radiation Instrumentation
- III Medical Radiation Protection
- IV Radiopharmaceuticals and Chemistry

Note: Classes I-IV satisfy the NRC, BRIH
Licensing Requirements of 10CFR35

Program Information:

All dates and locations may be subject to change. Complete program descriptions can be obtained from our office. Monographs relating to licensing requirements, Nuclear Oncology development/economics, and Clinical Preceptorships are available upon request.

Send completed enrollment card and tuition to:



Institute for Nuclear Medical Education
5171 Eldorado Springs Drive
Boulder, Colorado 80303
1-800-548-4024
303-499-4099

PHARMACY SPECIALTY BOARDS (NUSPEX)
Programs are designated as applicable to the fulfilling of board requirements to sit for examination by
*Board of Pharmaceutical Specialties
American Pharmaceutical Association*

APPROVED TRAINING - NUCLEAR MEDICAL TECHNOLOGY
Reviewed and approved for didactic instruction to qualify Nuclear Medical Technologists for state licensure.
*Board of Medical Examiners
Agreement State*

CARDIOVASCULAR NUCLEAR MEDICINE TRAINING
Listed as one of the thirty-four programs providing formal training in this field
*Cardiovascular Council
Society of Nuclear Medicine*

COLLEGE / UNIVERSITY CREDIT - PHYSICS
By prior arrangement, college/university credit for physics instruction in the BRIH program may be earned through
*Several Accredited Universities
ME / U*

ACCEPTED CONTINUING MEDICAL EDUCATION - Category 2A
The BRIH programs are designated as continuing medical education by the
*Division of Continuing Education
American Osteopathic Association*

CONTINUING EDUCATION - HEALTH PHYSICS
Continuing Education Credits granted by the
*Continuing Education Panel
American Academy of Health Physics*

CONTINUING EDUCATION - CEU
Accredited to provide Continuing Education Units (CEU) as a member of the
International Association for Continuing Education and Training

CONTINUING EDUCATION - VOICE
Society of Nuclear Medicine - Technologist Section
*Continuing Education Credits, VOICE
for technologist members of SNM*

NATIONAL SCIENCE TEACHING ASSOCIATION (NSTA)
Member and participant in the activities of the
*Secondary and Collegiate Programs
National Science Teachers Association*

AMERICAN ASSOCIATION OF PHYSICS TEACHERS (AAPT)
Member and participant in the activities of the
*American Institute of Physics
American Association of Physics Teachers*



Institute for Nuclear Medical Education
5171 Eldorado Springs Drive
Boulder, Colorado 80303
1-800-548-4024
303-499-4099

**PROGRAM REGISTRATION CARD
Basics of Radioisotope Handling**

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: (Day) _____

Please enroll me in the following classes:

Dates	Location	Class
_____	_____	_____
_____	_____	_____
_____	_____	_____

Tuition is due upon enrollment.
My tuition check for \$_____ is enclosed.
Make checks payable to INME. If you need to make alternate arrangements, please contact our office. On receipt of enrollment card, specific information for the classes selected (i.e., hotel location, rates, and reservation instructions) will be mailed.

TUITION SCHEDULE — 1993-1994

Level I, Radiation Therapy - Oncology consists of 80 hours of training divided into two 40 hour classes (III-IV). Tuition for each single class is \$700. Level II, Full Nuclear Medicine Licensure consists of 200 hours of training divided into four 50 hour classes (I-IV). Classes are offered in two sessions of two classes each. The tuition for each single class is \$875, for each session of two (2) classes is \$1,750, and for the entire 4 class BRIH series is \$3,500. Fellows, residents, and others in training may be eligible for a special rate of \$1,000 for Level I Radiation Therapy and \$2,500 for Level II BRIH.

TUITION REFUND POLICY

1. A Participant may cancel this agreement at any time by notifying the Institute in writing, by mail, or in person. If cancelled in writing within two (2) business days after the start of class, all monies shall be refunded within 10 days. A Participant rejected from training will receive a refund of all monies paid within 10 days. If Participant withdraws after the two (2) day period, all tuition fees shall be refunded on a pro-rated basis, less the registration fee not to exceed \$75.
2. Refunds due as a result of withdrawal will be made within 10 days from the date of withdrawal. Within 10 days of any refund, the Participant will receive a *Notice of Refund* stating the amount of the refund and to whom refund was made.
3. In calculating any tuition refund due, the percentage of attendance will be determined by the hours attended divided by the total hours of the program. In all cases of Participants who withdraw, or who are suspended or expelled, the following refund policy shall apply: The refund of tuition shall be equal to the total amount of tuition multiplied by the percentage attendance remaining.
4. All materials are provided by the Institute and become the property of the Participant.

1142 INME 6/93

The Institute For Nuclear Medical Education (INME) is pleased to provide a partial list of approvals and acceptances associated with the Basics of Radioisotope Handling Program (BRIH). For additional information please contact the program director at: 1-800-348-4024.

APPROVED SCHOOL

Certified as an Approved School and regulated by the
*Department of Higher Education
State of Colorado*

ACCREDITED INSTITUTION

Accredited by a national accrediting agency listed by the U.S. Secretary of Education
*Accrediting Commission of the Accrediting Council
for Continuing Education and Training (ACCET)*

RECOMMENDED FOR UNDERGRADUATE and GRADUATE CREDIT

Recommended for College/University credit for all courses by the
*American Council on Education (ACE) recognized
by American Association for Collegiate Registrars
Council on Post-Secondary Education*

REVIEWED AND LISTED BY THE NUCLEAR REGULATORY COMMISSION

Reviewed and listed by the NRC Service, Training and Information System (STIS) - list of accepted licensed providers by the
*Division of Industrial and Medical Safety
U.S. Nuclear Regulatory Commission*

LICENSED - RADIOACTIVE MATERIALS

Licensed to possess radioactive materials under the Atomic Energy Act/Agreement State Program Radiation Control Act title 15 by the
*Department of Public Health
State of Colorado*

ACCEPTED FOR LICENSURE - Medical License - USNRC

Licenses issued for medical use nationwide are in compliance with 10 CFR 35 [35.920(b)(1)] by
*Medical Licensing Branches
U.S. Nuclear Regulatory Commission*

ACCEPTED FOR LICENSURE - Medical License - AGREEMENT STATES

Where application has been made, every Agreement State has found the program in compliance and issued licenses for medical use by
*Medical Licensing Branch
Agreement States*

ACCEPTED FOR LICENSURE - Radiation Safety Officer - RSO

The requirements of 10 CFR 35.900 [35.92 (b) (1)] for Radiation Safety Officers may be met by the BRIH program through the
*U. S. Regulatory Commission
or Agreement State*