

APR 06 1994

Institute for Nuclear Medical Education, Inc.
ATTN: Clyde E. Pearce
Health Physics Licensing
5171 Eldorado Springs Drive
Boulder, Colorado 80303

Dear Mr. Pearce:

This refers to your letter dated December 9, 1993 received by the NRC Region I office on March 21, 1994. Your letter requests that we advise you as to the acceptability of clinical training provided to a US citizen by an off-shore university and medical school's radioisotope laboratory.

10 CFR 35.13 (b) states, in part, that a licensee must apply for and receive a license amendment before it permits anyone to work as an authorized user under the license. At such time as a licensee requests an amendment and submits documentation of the training and experience of the individual, we will review the request in accordance with 10 CFR Part 35, Subpart J requirements. If the individual's training and experience does not meet the requirements of Subpart J, the licensee may request exemption from Subpart J requirements in accordance with 10 CFR 35.19. 10 CFR 35.19 states, in part, that the Commission will review requests for exemptions from training and experience requirements with the assistance of its Advisory Committee on the Medical Uses of Isotopes (ACMUI). Based on the recommendation of the ACMUI, the NRC would make a decision on a request for an exemption.

I hope this letter have been responsive to your inquiry. Should you have any further questions, please contact me at (610) 337-5275.

Sincerely,

Original Signed by

Francis Costello, Chief
Medical Licensing Section
Division of Radiation Safety
and Safeguards

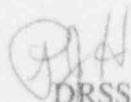
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Enclosure:
10 CFR Part 35

HOLS

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
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DRSS:RI
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4/5/94


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