

June 27, 2000

Mr. Aubrey V. Godwin, Director  
Arizona Radiation Regulatory Agency  
4814 South 40<sup>th</sup> Street  
Phoenix, AZ 85040-2940

SUBJECT: COMMENTS ON TRAINING AND EXPERIENCE REQUIREMENTS

Dear Mr. Godwin:

I am responding to your letter to Chairman Meserve dated May 25, 2000, that addresses the proposed training and experience requirements for physicians using iodine-131 (I-131) and the compatibility level assigned to these requirements.

The Commission considers the overall issue of training and experience to be one of the most important issues addressed during the rulemaking. The issue of training and experience for physicians using I-131, as well as the compatibility level associated with the training and experience requirements, were specifically discussed at public meetings between staff and the Commission and at public meeting with stakeholders. The Commission carefully considered all these comments. On February 16, 2000, the Commission approved the draft final rule language that was forwarded to the Commission on August 3, 1999, in SECY-99-201, "Draft Final Rule, 10 CFR Part 35, 'Medical Use of Byproduct Material.'" At the same time, the Commission directed the staff to revise the compatibility level assigned to the training and experience requirements for all categories of physician authorized users and other individuals from "C" to "B" to ensure that the training and experience requirements for the medical use of byproduct material are consistent between NRC and Agreement States.

Presently, the Commission is reviewing the final rulemaking package that incorporates the Commission's February 16, 2000, direction. The Commission is aware of the concerns raised by some Agreement States regarding these training and experience requirements and the associated compatibility level. Specifically, all Commissioners have been provided with a copy of your May 25th letter as well as correspondence received from other Agreement State representatives. In addition, this topic was discussed in some detail at the June 13, 2000, Commission briefing with the Conference of Radiation Control Program Directors and the Organization of Agreement States.

A. Godwin

2

If you have any further questions, please contact Catherine Haney of my staff at (301) 415-6825 or e-mail at [CXH@NRC.gov](mailto:CXH@NRC.gov).

Sincerely,

/RA by Martin J. Virgilo, Acting For/

William F. Kane, Director  
Office of Nuclear Material Safety  
and Safeguards

A. Godwin

2

If you have any further questions, please contact Catherine Haney of my staff at (301) 415-6825 or e-mail at [CXH@NRC.gov](mailto:CXH@NRC.gov).

Sincerely,

William F. Kane, Director  
Office of Nuclear Material Safety  
and Safeguards

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\*See previous concurrence

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