

August 8, 2000

American Association for  
Nuclear Cardiology, Inc.  
ATTN: Charles H. Rose  
5660 Airport Boulevard, Suite 101  
Boulder, Colorado 80301

SUBJECT: RESPONSE TO LETTER DATED SEPTEMBER 2, 1999 REGARDING RSO  
QUALIFICATIONS.

Dear Mr. Rose:

This is a reply to your letter dated September 2, 1999. You asked how an individual who is not an authorized user can become a Radiation Safety Officer at a non-hospital medical location.

There are three ways in which an individual may become qualified as a Radiation Safety Officer (RSO) as specified in 10 CFR 35.900. The individual may: (1) be certified by one of the certifying entities listed in 10 CFR 35.900 (a), (2) obtain the training and experience specified in 35.900 (b), or (3) be an authorized user as specified in 35.900(c).

Based on your letter, we assume that you are concerned with individuals who are not certified as specified in 35.900(a), and who are not authorized users. Such individuals must meet the training and experience requirements in 35.900(b). As indicated in your letter, the experience must be at a facility which meets the definition of a medical institution in 35.2.

We trust that this reply clarifies our requirements.

Sincerely,  
**/RA/**  
John W. N. Hickey  
Materials Safety and Inspection Branch  
Division of Industrial and  
Medical Nuclear Safety

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