

February 12, 2003

MEMORANDUM TO: William D. Travers
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS - SECY-02-0194 - OPTIONS FOR
ADDRESSING PART 35 TRAINING AND EXPERIENCE ISSUES
ASSOCIATED WITH RECOGNITION OF SPECIALTY BOARDS
BY NRC

The Commission has approved Option 3. The staff should prepare a proposed rule, without the generation of an additional rulemaking plan, to modify the training and experience requirements based on the recommendations submitted by the Advisory Committee on the Medical Uses of Isotopes (ACMUI). The Commission has approved the proposal that all boards that meet the criteria for recognition by the NRC will be listed on the NRC website rather than in the rule itself.

In addition, the preceptor statement should remain as written in the final Part 35 rule. The staff should clarify that the preceptor language does not require an attestation of general clinical competency, but does require sufficient attestation to demonstrate that the candidate has the knowledge to fulfill the duties of the position for which certification is sought. This form of attestation should be preserved for both pathways of certification (i.e., through board certification or through training and experience).

Because of the important role of Board certification, a clear regulatory determination that all Boards, both new and existing, meet the relevant criteria should be required. As part of the rulemaking process, the staff should discuss implementing procedures both for adding new speciality boards to the recognized listing and for removing boards from the recognized list. While the NRC staff is not expected to conduct inspections of the recognized speciality boards, the staff should monitor trends in medical events. If a particular speciality for some reason has a series of medical events that can be attributed to inadequate radiation safety training, the staff will need to determine if the training should have been site specific or should have been provided by the speciality boards. If the staff determines that changes in radiation safety training by a recognized speciality board are necessary and the speciality either cannot or will not make adequate changes to its training program to address our needs, then that speciality board should be removed from our recognized list. However, appropriate due process would require that the procedures are established in advance for removing a speciality board from the recognized list. In addition, the Commission should be informed of any staff decision to remove a board from the recognized list.

cc: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
OGC
CFO
OCA
OIG
OPA
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)
PDR