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Thomas H. Essig
Designated Federal Official
ACMUI
U.S. Nuclear Regulatory Commission

RE: Preceptor attestation in sections 35.50, 35.51, 35.55, 35.190, 35.290, 35.390, 35.392, 35.394, 35.490

Dear Mr. Essig:

The purpose for this memo is to restate the consensus position of ACMUI that a preceptor attestation should not be a requirement for specialty boards to qualify under 10 CFR 35 sections that specify training requirements for radiation safety officers, authorized medical physicists, authorized nuclear pharmacists, or authorized users.

The criteria for recognition of specialty boards should not include the requirement that candidates for certification obtain written attestation of competency signed by a preceptor. Specialty boards assess mastery of a body of knowledge and adequacy of judgment to independently practice health physics, medical physics, nuclear pharmacy, or a medical radiation specialty. Each board has a process to assure that candidates are knowledgeable before they take the board exams. This process includes a requirement that the candidate's supervisor and other professionals provide letters of recommendation attesting to the knowledge of the candidate. In many cases the supervisor is a preceptor as defined in Part 35. The letters do not attest to an individual's ability to function independently in a specific position, because the individual may not be applying for that specific position, e.g. medical radiation safety officer. For example, candidates for the American Board of Health Physics do not all become medical radiation safety officers; many become regulators, nuclear power health physicists, or health physicists in academia or industry. Therefore, the letters attest to the candidate's knowledge in health physics. Attestation by a preceptor as defined in Part 35 training and education sections is neither needed nor desired in the board certification pathway. Thus, the ACMUI restates its recommendation that the requirements for a preceptor statement be removed from the certification pathway.

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If the Commission still feels it is necessary to include a preceptor statement for all authorized positions named in Part 35, the ACMUI recommends that this requirement be separated from the board certification pathway and the alternate pathway and specified separately as a new paragraph in each training section. For example, in section 35.50, remove the requirement for a preceptor attestation from both the board pathway and alternate pathway and add a new paragraph that would require the licensee to obtain an attestation, signed by a preceptor Radiation Safety Officer, that the individual has achieved a level of radiation safety knowledge sufficient to function independently as a Radiation Safety Officer for a medical use licensee.

Thank you for your attention to this matter.

Sincerely,

Manuel D. Cerqueira, M.D.
Chair
ACMUI

Ccc: Charles Miller
Patricia Holahan