

Dear Dr. Howe,

I have attached the proposed ABNM response to your inquiries. Before I send this letter to Mr. Essig, I wanted to send it to you to confirm that I accurately answered your inquiries based on our conference call discussion.

Thanks again for your help. Hope you are feeling better.

Henry D. Royal, M.D. 314 362-2809
<royalh@mir.wustl.edu>

Division of Nuclear Medicine
Mallinckrodt Institute of Radiology
510 S. Kingshighway Blvd.
St. Louis, MO 63110

(See attached file: ABNM To NRC 050926.doc)

Mail Envelope Properties (43380587.8AB : 8 : 51371)

Subject: ABNM Response to NRC.
Creation Date: 9/26/05 10:28AM
From: <RoyalH@mir.wustl.edu>

Created By: RoyalH@mir.wustl.edu

Recipients

nrc.gov
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DBH (Donna-Beth Howe)

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Files	Size	Date & Time
MESSAGE	519	09/26/05 10:28AM
TEXT.htm	633	
ABNM To NRC 050926.doc	61952	
Mime.822	87785	

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Dr. Howe,

Things got crazy last Friday so I wasn't able to call you.

I have attached our proposed solution to the issue of giving the NRC the assurances it has requested that ABNM diplomates meet the new NRC training requirements. We have added a new section to our Evaluation of Clinical Competence form (page 3) entitled COMPLIANCE WITH NRC TRAINING AND EXPERIENCE REQUIREMENTS. In order for a US trained resident to be accepted to take the ABNM certification examination, the answer to these 4 questions must be yes.

The Board believes that this will provide the highest level of assurance possible since this form will be completed by the program director on every applicant for the certification examination every year. The form itself will serve as a yearly reminder that in order for a nuclear medicine residency program to be acceptable to the ABNM it must include the NRC T&E requirements.

Please page me tomorrow (314 407-9402) so we can discuss whether this addresses the NRC's remaining concern.

Henry D. Royal, M.D. 314 362-2809
<royalh@mir.wustl.edu>

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St. Louis, MO 63110

(See attached file: Evaluation of Clinical Competence 051010.pdf)

Mail Envelope Properties (434A8A41.5EC : 20 : 54764)

Subject: Re: Review of ABNM submission
Creation Date: 10/10/05 11:34AM
From: <RoyalH@mir.wustl.edu>

Created By: RoyalH@mir.wustl.edu

Recipients

nrc.gov
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DBH (Donna-Beth Howe)
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Evaluation of Clinical Competence 051010.pdf		195785
Mime.822	272752	

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Dear Mr. Essig,

I have attached a follow-up letter to my August 16, 2005 letter. Your staff has been very helpful in resolving several issues. I hope that the attached letter and its attachments have resolved all of the remaining issues to your satisfaction and that the NRC will continue to recognize the ABNM certification pathway as meeting the NRC's T&E requirements.

Copies of this letter on ABNM stationary and the attachments are being sent by regular mail.

Please let me know if you need any additional information.

Sincerely,

Henry D. Royal, M.D. 314 362-2809
<royalh@mir.wustl.edu>
Executive Director, ABNM

Division of Nuclear Medicine
Mallinckrodt Institute of Radiology
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(See attached file: ABNM To NRC 051017.doc) (See attached file: Evaluation of Clinical Competence 051016.ppt)(See attached file: CE Certificate 051017 example.pdf)

Mail Envelope Properties (4352B573.4D7 : 14 : 29911)

Subject: Recognition of ABNM
Creation Date: 10/16/05 4:16PM
From: <RoyalH@mir.wustl.edu>

Created By: RoyalH@mir.wustl.edu

Recipients

nrc.gov

twf4_po.TWFN_DO
THE (Thomas Essig)
REZ CC (Ronald Zelac)
DBH CC (Donna-Beth Howe)

nrc.gov

OWGWPO02.HQGWDO01
CMF CC (Cynthia Flannery)

nrc.gov

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MSS CC (Mohammad Saba)

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Files	Size	Date & Time
MESSAGE	905	10/16/05 04:16PM
TEXT.htm	1061	
ABNM To NRC 051017.doc	68096	
Evaluation of Clinical Competence 051016.ppt	596992	
CE Certificate 051017 example.pdf	43530	
Mime.822	974408	

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

**Concealed Subject:
Security:**

No
Standard

Dr. Royal,

This is to follow up on our telephone conversation of September 13, 2005. In reviewing the American Board of Nuclear medicine certification process for recognition by NRC, the following items and deficiencies were noted:

1. ABNM requested recognition under 35.392, 35.394, 35.396 as well as 35.390. NRC regulations are set up so that 35.390 is the training and experience requirement for all uses of unsealed byproduct materials requiring a written directive. Diplomats of a Board recognized under 35.390 are eligible to be authorized users for all four types of clinical use described in 35.390(b)(ii)(G), provided they also have the preceptor attestations and case work required. My understanding of the ABNM certification process is that all candidates must have the clinical case work specified in 35.390(b)(ii)(G) before they are eligible to take the examination. If this is the case, it is not necessary for the ABNM to seek recognition under 35.392 or 35.394. Further 35.396 is specifically written for physicians meeting requirements under 35.490 and 35.690 and does not have an independent board recognition process.
2. The ABNM certification process accepts candidates that have received their nuclear medicine training outside the US (Canada and abroad). 10 CFR 35.190(a), 35.290(a), and 35.390(a) all require work experience in specific topics under the supervision of an appropriate authorized user. Please clarify how all your candidates will meet these requirements, or how your certification process will distinguish all the candidates that meet these requirements from those that don't.
3. The ABNM certification process accepts candidates from accredited nuclear medicine residency programs but has different length of residency requirements based on the level of training received in precursor programs. Please clarify how you assure all your candidates, even those in the 1 year nuclear medicine residency program, receive: the 60 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for uptake, dilution, and excretion studies; 700 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for imaging and localization studies; and 700 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for use of unsealed byproduct material for which a written directive is required.
4. The ABNM accepts candidates from nuclear medicine residency programs that are accredited by the Professional Corporation of Physicians of Quebec which is not one of the accreditation boards listed in 35.390(a)(1). Please clarify how all your candidates will meet the requirement for successfully completing a residency program approved only by one of accreditation programs listed in the NRC regulations, or how your certification process will distinguish all the candidates that meet this requirement from those that don't.
5. The ABNM accepts candidates from residency programs approved by the Residency Review Committee of the Accreditation Council for Graduate Medical Education and your submission included the current program requirements for residency education in Nuclear Medicine (Attachment 1) and the proposed program requirements (Attachment 2). The ABNM appears to depend upon the residency programs to provide the NRC required training and experience hours, although the current program does not specifically address the training NRC requires in 10 CFR 35.190, 35.290, or 35.390. Even though the proposed program includes the topics listed in 35.190, 35.290, and 35.390, it does not indicate how many hours of the residency program will be devoted to these topics. Please clarify how you assure each residency program completed by your candidates includes: the 60 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for uptake, dilution, and excretion studies; the 700 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for imaging and localization studies; and the 700 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for use of unsealed byproduct material for which a written directive is required.
6. The nuclear medicine residency programs include training requirements in "mathematics." Please clarify whether this training includes "mathematics pertaining to the use and measure of radioactive material." If it does not, please explain how you assure all candidates receive training in "mathematics pertaining to the use and measure of radioactive material" for use in uptake dilution, excretion, imaging, and localization studies, as well as in use of unsealed byproduct material for which a written directive is required.
7. The ABNM web site guidance on "Certification Requirements in Nuclear Medicine" does not specify that the candidate has to have the required 60 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for uptake, dilution, and excretion studies; the required 700 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for imaging and localization studies; and the required 700 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required

topics for use of unsealed byproduct material for which a written directive is required. It just list the topics and indicates the training and experience is needed in "imaging and localization studies and therapy." How are your candidates informed they need the required training and experience in uptake, dilution, and excretion and that they need a minimum of 60 hours for 35.100 uses, 700 hours for 35.200 uses and 700 hours for 35.300 uses?

8. The ABNM website indicates that candidates may apply for and receive credit for training in other programs toward the nuclear medicine requirements. Please clarify how the ABNM assures all candidates will meet the specific requirements outlined in the board certification process in 10 CFR 35.190, 35.290, and 35.390 when credit is given toward nuclear medicine requirements.

9. The board certification processes in 10 CFR 35.190 and 35.290 requires all candidates to have completed the specified training and experience. The board certification processes in 10 CFR 35.390 requires all candidates to have successfully completed the required residency program. The ABNM web site provides an appeal mechanism if the residency program director's evaluation indicates the applicant's competency in nuclear medicine is unsatisfactory. Clarify whether a residency program director's evaluation indicating the applicant's competency in nuclear medicine is unsatisfactory is an indication of whether the applicant has completed the NRC required training and experience or successfully completed the NRC required residency program. If it is, please clarify how the board assures the completion of NRC required training and experience or satisfactory completion of a NRC required residency program for all candidates.

10. Since some of the clarifications or changes may not take effect for some time, please indicate when the ABNM certification process will comply with all of the requirements for each of the board recognition processes in 10 CFR 35.190(a), 35.290(a), and 35.390(a).

If you have any questions or I have not accurately captured an item or deficiency, please call me at (301) 415-7848 or e-mail me at the above address. Also, please acknowledge receipt of this e-mail so I will know that you received it.

Donna-Beth Howe, Ph.D.
NMSS/IMNS/MSIB
Candidates includes: the 60 hours of t

Mail Envelope Properties (4329F3A7.959 : 11 : 912)

Subject: Review of ABNM submission
Creation Date: 9/15/05 6:20PM
From: Donna-Beth Howe

Created By: DBH@nrc.gov

Recipients
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Files

MESSAGE

Size

9140

Date & Time

09/15/05 06:20PM

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Dr. Royal,

I did a reviewed your response and discussed your responses and my findings with other members of our "Medical Radiation Safety Team." We do this to assure uniform review of all applications and as a quality control check on the information being requested.

Your responses to Issues 1, 2, 4, and 6 were good and will address our concerns, provided you include a sample of the certification documents so we can see how to distinguish between the certificates for foreign and US trained individuals.

Your response to Issues 7 would be more informative if you either provided a web site link to the appropriate regulation (<http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0190.html> <http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0290.html> <http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0390.html>) or identify each of the topics listed in the appropriate 35.190(c)(1), 35.290(c)(1), or 35.390(b)(1) under each of the hour requirements so that the candidates and other interested persons could review the topics. This information would clarify that these hours are focused on radiation safety and not areas NRC considers the practice of medicine (the topics under the supervised clinical experience in Subpart J that were not retained in Subparts D and E).

The response to Issue 9 is missing a key word after "successfully" in the sentence "During the appeals process, the ABNM will interview the program director and the applicant and independently determine if the candidate's has **successfully** their nuclear medicine residency program including the NRC required training and experience." I think once the missing word is inserted that response will be good also.

I have concerns with the answers to questions 3, 5, and 8. (1) You cannot depend on the ACGME documented requirements for a 2 year nuclear medicine residency program because the documentation provided did not address NRC's issues with respect to radiation safety training topics or hours. (2) It is not clear how to reach the conclusion that the 2,000 hour 1 year residency provides ample time to meet NRC's training and experience requirements when the hours required are a significant fraction of those 2,000 hours. The same general problem appears to be true for the credit given for other programs toward nuclear medicine requirements. The ABNM needs to confirm that all candidates seeking US certification meet the specific requirements in 10 CFR 35.190(a)(1), 35.290(a)(1), and 35.390(a)(1). (3) With regard to the cognitive examination, questions in the examination on the topics is not really an assurance that the candidates having the minimum hours in the required topics. We reviewed the examination information and did not have significant questions on that area. We need something more concrete on how you assure the candidates have the required hours in the required topics.

If I had a really strong response to 3, 5, and 8 then the response to 10 would address the previously certified physician issue. But you need to provide assurances that the previous candidates had the required hours in the required topics. I also expected to see an indication of when the proposed changes to the ACGME would become final and a discussion on a

proposal to have the hours as well as the topics incorporated into the residency program requirements.

Donna-Beth Howe, PhD
US NRC
NMSS/IMNS
(301) 415-7848

>>> <RoyalH@mir.wustl.edu> 09/26/05 10:28 AM >>>

Dear Dr. Howe,

I have attached the proposed ABNM response to your inquiries. Before I send this letter to Mr. Essig, I wanted to send it to you to confirm that I accurately answered your inquiries based on our conference call discussion.

Thanks again for your help. Hope you are feeling better.

Henry D. Royal, M.D. 314 362-2809
<royalh@mir.wustl.edu>

Division of Nuclear Medicine
Mallinckrodt Institute of Radiology
510 S. Kingshighway Blvd.
St. Louis, MO 63110

(See attached file: ABNM To NRC 050926.doc)

Mail Envelope Properties (4341854C.AA2 : 11 : 912)

Subject: Re: ABNM Response to NRC.
Creation Date: 10/3/05 3:23PM
From: Donna-Beth Howe

Created By: DBH@nrc.gov

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MillerT CC (MillerT@mir.wustl.edu)
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Files

MESSAGE

Size

6187

Date & Time

10/03/05 03:23PM

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Dr. Royal,

I reviewed your revised form.

The basic idea solves the problem. As discussed below, a few adjustments are needed to ensure compliance with our regulations.

The major adjustment is that each set of hours needs to be under the supervision of an authorized user with slightly different authorizations. Before the 2005 revision of Part 35, the 35.390 authorized user could supervise the work experience for each group. However with the revision the 35.390 authorized user now needs additional work experience with eluting generators, i.e., authorized for 35.200 uses, to supervise the work experience under 35.290. Also the authorized users that came under Subpart J training and experience do not align with the new 2002 Part 35 rule.

You should consider putting the web citations under the appropriate requirement. If the individual went to the web site, it would clarify the specific requirements for that section.

The following is offered for your consideration:

This applicant has had the 60 hours of training and experience as required by 10 CFR 35.190 see <http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0190.html> for specifics.

This training and experience was obtained under the supervision of an authorized user who meets the requirements under §§35.190, 35.290, 35.390, or, before October 24, 2005, §§ 35.910, 35.920, or 35.930, or equivalent Agreement State requirements.

This applicant has had the 700 hours of training and experience as required by 10 CFR 35.290 see <http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0290.html> for specifics.

This training and experience was obtained under the supervision of an authorized user who meets the requirements under §§ 35.290 or 35.390 authorized for 35.200 uses, or, before October 24, 2005, 35.920 or equivalent Agreement State requirements.

This applicant has had the 700 hours of training and experience as required by 10 CFR 35.390 see <http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0390.html> for specifics.

This training and experience was obtained under the supervision of an authorized user who meets the requirements under §§35.390 or before October 24, 2005, §§ 35.930, or equivalent Agreement State requirements.

Issue 10

With a new letter that addresses Issues 1, 2, 4, 6, 7, and 9 of the earlier questions and a satisfactory response to the hours issue (Issues 3, 5, and 8) we should be able to recognize your board certification process.

The key remaining issue is number 10 - the effective date that your program will met or has met our requirements. Responses that are a clarification of existing practices or codify existing practices would not preclude the Board from selecting an earlier date. Those changes that represent changes to your process such as issuing different certificates and requiring certification of the hours preclude selecting an earlier date without an acceptable retroactive solution.

Issuing a new certificate to those US trained physicians that are not listed on the license yet (the 2004 and 2005 test takers) is a solution for the 2005 test takers and an acceptable retroactive solution for the 2004 candidates. Do you have an approach for the hours issue? At this point your response appears to be a future correction that would be in effect for the 2006 test takers. Do you have a solution for the 2004 test takers that are not listed on a license and the 2005 test takers?

Donna-Beth Howe, Ph.D.
US NRC
NMSS/IMNS
(301) 415-7848

>>> <RoyalH@mir.wustl.edu> 10/10/05 11:34 AM >>>

Dr. Howe,

Things got crazy last Friday so I wasn't able to call you.

I have attached our proposed solution to the issue of giving the NRC the assurances it has requested that ABNM diplomates meet the new NRC training requirements. We have added a new section to our Evaluation of Clinical Competence form (page 3) entitled COMPLIANCE WITH NRC TRAINING AND EXPERIENCE REQUIREMENTS. In order for a US trained resident to be accepted to take the ABNM certification examination, the answer to these 4 questions must be yes.

The Board believes that this will provide the highest level of assurance possible since this form will be completed by the program director on every applicant for the certification examination every year. The form itself will serve as a yearly reminder that in order for a nuclear medicine residency program to be acceptable to the ABNM it must include the NRC T&E requirements.

Please page me tomorrow (314 407-9402) so we can discuss whether this addresses the NRC's remaining concern.

Henry D. Royal, M.D. 314 362-2809
<royalh@mir.wustl.edu>

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Mallinckrodt Institute of Radiology
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St. Louis, MO 63110

(See attached file: Evaluation of Clinical Competence 051010.pdf)

Mail Envelope Properties (434C2576.92A : 11 : 912)

Subject: Re: Review of ABNM submission
Creation Date: 10/11/05 4:49PM
From: Donna-Beth Howe

Created By: DBH@nrc.gov

Recipients

mir.wustl.edu

RoyalH (royalh@mir.wustl.edu)

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Files

MESSAGE

Size

8060

Date & Time

10/11/05 04:49PM

Options

Expiration Date:

None

Priority:

Standard

Reply Requested:

No

Return Notification:

None

Concealed Subject:

No

Security:

Standard

Dr. Royal,

We received your ABNM letter today. It looks very good with the exception of the authorized user credentials in Issues 2 , an "or" instead of an "and" in Issue 3, and authorized user credentials for § 35.290 in "Compliance with NRC Training and Experience Requirements."

As explained in my e-mail of October 11, 2005, the 2002 revision of Part 35, permitted the § 35.390 authorized user to supervise the work experience for each group. However, in the 2005 revision, the § 35.390 authorized user now needs additional work experience with eluting generators, i.e., authorized for § 35.200 uses, to supervise the work experience under § 35.290.

Per our discussion today, the following are offered for your consideration:

Issue 2, Revise the statement " authorized users who meet the requirements in § 35.390, or before October 24, 2005, § 35.930 or equivalent Agreement State requirements," to add other appropriate authorized users. As written it unduly restricts the individuals that can supervise the work experience in § 35.190 and does not include an authorized user that can supervise the work experience in § 35.290. Stating the specific authorized users with the appropriate regulation is not easy and might introduce critical typo. You may want to simply state "All training in the United States is under the supervision of an appropriate authorized user as described in the "Compliance with NRC Training and Experience Requirements" section in the attached "American Board of Nuclear Medicine, Evaluation of Clinical Competence."

Issue 3. Your October 10, 2005 e-mail clarified that the ABNM would require all boxes in the "Compliance with NRC Training and experience Requirements" section of the "Evaluation of Clinical Competency" form had to be marked with a "yes" before an individual was accepted to take the examination. The current response to Issue 3 indicates the candidate has to meet the requirements in 35.190, 35.290, **or** 35.390 which in regulatory space does not mean the same thing as meeting the requirements in 35.190, 35.290, **and** 35.390. The "or" indicates any one of the three; not all of the three.

Revision of the "or" in each of your 35.190, 35.290, 35.390 lists to an "and" in issue 3 would clarify that all boxes had to be marked "yes" and conform to the statement made in your the October 10 , 2005 e-mail.

"Compliance with NRC Training and Experience Requirements" Revise the training and experience statement for the 35.290 portion of the training and experience to delete the 35.910 and 35.930 authorized users. The revised statement would read "... under the supervision of an authorized user who meets the requirements under §§ 35.290 or 35.390

authorized for 35.200 uses, or, before October 24, 2005, § 35.920 or equivalent Agreement State requirements."

Donna-Beth Howe, Ph.D.
US NRC
NMSS/IMNS
(301) 415-7848

>>> <RoyalH@mir.wustl.edu> 10/17/05 1:23 PM >>>

FYI,

The ABNM website has been updated. See below.

Henry D. Royal, M.D. 314 362-2809
<royalh@mir.wustl.edu>

Division of Nuclear Medicine
Mallinckrodt Institute of Radiology
510 S. Kingshighway Blvd.
St. Louis, MO 63110
----- Forwarded by Henry Royal/MIR/Medicine/Washington University on
10/17/2005 12:23 PM -----

"Ong Jeremy"
<JOng@snm.org>

10/17/2005 11:59 AM To
"ROYAL HENRY"
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cc

"GRAHAM MICHAEL"
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"MILLER TOM"
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CHRISTOPHER" <palestro@lij.edu>,
<Tony_Parker@BIDMC.Harvard.edu>,
<barry.shulkin@stjude.org>,
"Internet Services"
<InternetServices@snm.org>
Subject
RE: Update for ABNM website

Hello Dr. Royal,

Thanks for sending in the update. I went ahead and added it to the webpage:

<http://www.abnm.org/frameset-certreq.html>

Best Regards,

Jeremy Ong
Internet Coordinator
Society of Nuclear Medicine

703-708-9000 ext. 1256
fax: 703-708-9777
email: jong@snm.org
<http://www.snm.org/>
<http://www.healthpronet.org/>

From: RoyalH@mir.wustl.edu [mailto:RoyalH@mir.wustl.edu]
Sent: Sunday, October 16, 2005 2:37 PM
To: Reuss Ted
Cc: GRAHAM MICHAEL; MILLER TOM; PALESTRO CHRISTOPHER;
Tony_Parker@BIDMC.Harvard.edu; barry.shulkin@stjude.org
Subject: Update for ABNM website

Ted,

On <http://www.abnm.org/frameset-certreq.html>, please add the following under the heading "REQUIREMENTS FOR CERTIFICATION IN NUCLEAR MEDICINE ". We have told the NRC this would be posted by Monday, October 24, 2005. Please let me know when it is posted.

G. Compliance With NRC Training and Experience Requirements

All candidates for the certification examination must have the training and experience required under 10 CFR 35.190, 10 CFR 35.290, 10 CFR.390. This includes 60 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for uptake, dilution, and excretion studies; 700 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for imaging and localization studies; and 700 hours of training and experience in basic radionuclide handling techniques and radiation safety in the required topics for use of unsealed byproduct material for which a written directive is required.

See the following links for additional information.

<http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0190.html>

<http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0290.html>

<http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0390.html>

Thanks.

Henry D. Royal, M.D. 314 362-2809
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Mallinckrodt Institute of Radiology
510 S. Kingshighway Blvd.
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Mail Envelope Properties (43542B00.35B : 11 : 912)

Subject: Re: Fw: Update for ABNM website
Creation Date: 10/17/05 6:51PM
From: Donna-Beth Howe

Created By: DBH@nrc.gov

Recipients

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RoyalH (RoyalH@mir.wustl.edu)

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mir.wustl.edu

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MESSAGE

Size

14066

Date & Time

10/17/05 06:51PM

Options

Expiration Date:

None

Priority:

Standard

Reply Requested:

No

Return Notification:

None

Concealed Subject:

No

Security:

Standard