



American Board of Health Physics

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August 1, 2006

U.S. Nuclear Regulatory Commission
ATTN: Mr. Thomas H. Essig, Chief
Materials Safety and Inspection Branch (MS T8F3)
11545 Rockville Pike
Rockville, MD 20852

Subject: RECOGNITION OF SPECIALTY BOARDS

Reference: Letter from Thomas H. Essig to the American Board of Health Physics,
Recognition of Board, November 28, 2005

Letter from Mary L. Birch to Thomas H. Essig, U.S. Nuclear Regulatory
Commission, *Recognition of Specialty Boards*, November 7, 2005

Letter from Mary L. Birch to Thomas H. Essig, U.S. Nuclear Regulatory
Commission, *Recognition of Specialty Boards*, July 29, 2005

Dear Mr. Essig:

In your letter of November 28, 2005, you indicated that the ABHP certification would be listed with a recognition date of January 1, 2006 on the NRC website for Part 35 matters. This was based on the information in the ABHP letter of November 7, 2005.

We have recently completed a review of the Academic credentials of all certifications granted in 2005 and all individuals met the current NRC academic requirements. As a result, you may update the listing of the ABHP on your website to cover all certifications granted from January 1, 2005 to present.

However, while ABHP academic requirements have always required a degree, the Board has had an exception in place (through 1997), that in extraordinary circumstances, candidates lacking a degree but who compensated with experience and physical science coursework, could be approved, at the discretion of the Board. This would allow some candidates for certification to become a CHP either with no bachelors (or higher) degree, or with a bachelors (or higher) degree in some subject other than a physical or biological science or engineering.

As the ABHP certification process could have allowed individuals to become certified that did not meet the NRC Degree requirements prior to 2005, the Board cannot guarantee that all of its CHPs prior to 2005 meet the new requirements. A review of the relevant files, however, does give us enough data to suggest that well in excess of 95 percent of those certified prior to 2005

fully meet the NRC Academic requirements. While this fact is not relevant to the NRC requirement to ensure appropriate academic credentials for RSOs on Part 35 licenses, it should be kept in mind in the discussion listed below.

Description of Current Situation

Since its inception in 1958, the American Board of Health Physics has granted certification to 2,019 individuals, of which 1,302 are currently active in the field of Health Physics. With the exception of those CHPs who are listed as Radiation Safety Officers (RSOs) prior to April 29, 2005 per 10 CFR 35.57(a), only the 16 CHPs who were granted certification in 2005 would qualify under 10 CFR 35.50(a) as meeting the experience and training requirements for RSO.

The requirements for recognition of a specialty board certification process are contained in 10 CFR 35.50(a)(1) and consist of three separate requirements: (i) academic, (ii) experience, and (iii) examination on knowledge and competence. I will discuss each in turn, ending with the academic requirements.

Experience Requirements

10 CFR 35.50(a)(1)(ii) requires five or more years of professional health physics experience, of which three years must be in applied health physics. Graduate training may be substituted for no more than 2 years of the required experience. In comparison, the ABHP has always required a minimum of six years professional level experience with at least three years in applied health physics. Our policies allow a related masters degree to substitute for one year of experience and allow two years for a related doctorate degree. These experience requirements have always been in place by the Board since its inception. Therefore, the ABHP meets 10 CFR 35.50(a)(1)(ii) for all of its granted certifications.

Examination Requirements

10 CFR 35.50(a)(1)(iii) requires that individuals pass an examination administered by diplomats of the specialty board, and that the subject matter covered by the examination include several listed topic areas. Since 1987, the content of the examinations given by the ABHP has been formalized in the Domains of Practice which were included in our letter of July 29, 2005 and which are posted at our internet website (www.aahp-abhp.org) in the Examination Preparation Guide section. Prior to 1987, the ABHP did not have formal content guidelines, but a review of our examinations back to 1960 show that the NRC required content topics have been covered in every examination. Therefore, the ABHP meets 10 CFR 35.50(a)(1)(iii) for all of its granted certifications.

Academic Requirements

10 CFR 35.50(a)(1)(i) requires a bachelor's or graduate degree from an accredited college or university in physical science or engineering or biological science with a minimum of 20 college credits in physical science. As noted previously, while the ABHP has required a degree in an appropriate discipline for certification, it has in extraordinary circumstances granted certification to individuals who had compensating experience and physical science credits well in excess of the 20 credits required by § 35.50(a)(1)(i). Strictly speaking, this means that by process, the ABHP cannot ensure that all certifications prior to 2005 will fully meet NRC degree

requirements, although the vast majority of granted certification are to individuals who do meet these requirements.

As the only difference between the NRC requirements of § 35.50(a)(1) and the historical requirements for certification by the ABHP are the degree requirements which most individuals meet, I would recommend the following course of action that would meet the intent of the NRC requirements. At the same time, this course of action would remove the undue and unnecessary burden on RSO applicants and NRC reviewers to use alternative methods for verifying the Experience and Training requirements for Certified Health Physicists.

Recommended Course of Action

My recommendation is that all certifications granted by the ABHP since its inception through January 1, 2005, be deemed as meeting the Experience and Training Requirements for an RSO, provided that the individuals at the same time demonstrate that they meet the NRC academic requirements of § 35.50(a)(1)(i) through the submittal of official transcripts.

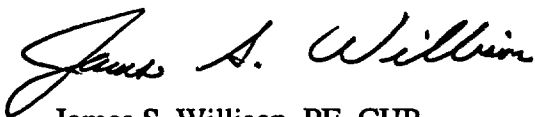
Should this recommended course of action be accepted, I would also recommend that a note be added to the NRC website listing of specialty boards stating that CHPs from years prior to 2005 meet the experience and examination requirements, but must demonstrate compliance with academic requirements of § 35.50(a)(1)(i).

The process of certifying health physicists by the ABHP has changed remarkably little over the past 46 years. In light of this, the ABHP still feels that all of the individuals who have been granted certification since 1960 are more than qualified by knowledge and experience to be listed as RSOs as referenced in Standards of Qualification and Practice (SQ/P)-002, "Qualifications for Healthcare Facility Radiation Safety Officer." This document was issued by the American Academy of Health Physics and the Medical Health Physics Section of the Health Physics Society and references many NRC and NCRP documents.

The recommended course of action listed above will allow the vast majority of qualified CHPs to have their credentials recognized through 10 CFR 35 at this time.

Should you have any questions or need additional information, please contact me at (803) 502-9852 or at e-mail address: jim.willison@wsms.com. Thank you for this consideration.

Respectfully Submitted,



James S. Willison, PE, CHP
Chair, American Board of Health Physics

Cc: Richard J. Burk, Jr., Secretariat
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