

August 31, 2011

Mr. Charles H. Rose, Executive Director
American Association for Nuclear
Cardiology, Inc.
5660 Airport Boulevard, Suite 101
Boulder, CO 80301

SUBJECT: Supervised Individuals Performing Diagnostic Nuclear Medicine Procedures

Dear Mr. Rose:

This letter is in response to your correspondence dated July 22, 2011, addressed to Robert J. Lewis, Director, Division of Materials Safety and State Agreements, Office of Federal and State Materials and Environmental Management Programs. In your correspondence, you requested that the U.S. Nuclear Regulatory Commission (NRC) respond to questions pertaining to which, if any, regulatory requirements would be applicable to individuals administering radiopharmaceuticals. Specifically you asked, "Are there any specific regulatory requirements, in your agency, that must be met by the individual administering the radiopharmaceutical?" and "Who is permitted and what training/certification must they have to perform this activity?"

Unless an individual is an Authorized User (AU) under an NRC or Agreement State license, the individual, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 35.11 may only administer radiopharmaceuticals under the supervision of an AU. Individuals working with or in the vicinity of licensed material must also have adequate safety instructions as required by 10 CFR Parts 19 and 35. More specifically, for individuals who, in the course of employment, are likely to receive in a year an occupational dose of radiation over 1 millisievert (100 millirem), the licensee must provide safety instructions as required by 10 CFR 19.12. Also, the licensee's AUs and Authorized Nuclear Pharmacists (ANPs) must provide safety instructions to all personnel using byproduct material under their supervision in accordance with 10 CFR 35.27. Furthermore, the supervised individual must follow the instructions of the supervising AU or ANP.

If you have any additional questions regarding the information provided here, you may contact Mr. Michael Fuller of my staff at (301) 415-0520, or Michael.Fuller@nrc.gov.

Sincerely,

/RA/

James G. Luehman, Acting Director
Division of Materials Safety
and State Agreements
Office of Federal and State Materials
and Environmental Management Programs

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James G. Luehman, Acting Director
Division of Materials Safety
and State Agreements
Office of Federal and State Materials
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