

**From:** Ely, Karen O CIV USN BUMED (US)  
**To:** [Seeley, Shawn](#)  
**Cc:** [Delzer, Jeffrey A LCDR USN NAVMCPUBHLHCEN PORS \(US\)](#)  
**Subject:** [External\_Sender] FW: [Non-DoD Source] REQUEST: Input on Questionnaire for NRC Training and Experience Evaluation  
**Date:** Friday, April 27, 2018 4:14:40 PM

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Here is the response from naval Medical Center Portsmouth.

Very respectfully,

Karen

Karen O. Ely  
Health Physicist, Radiation Health Team  
Occupational and Environmental Medicine  
Navy and Marine Corps Public Health Center, Portsmouth, VA 23708-2103  
PH: (757) 953-0767; DSN: 377-0767; (757) 390-0234 (blackberry)  
FAX: (757) 953-0670  
E-MAIL: karen.o.ely.civ@mail.mil

-----Original Message-----

From: Van Way, Ricky L CIV USN NAVHOSP PORS VA (US)  
Sent: Friday, April 27, 2018 3:44 PM  
To: Ely, Karen O CIV USN BUMED (US) <karen.o.ely.civ@mail.mil>  
Subject: RE: [Non-DoD Source] REQUEST: Input on Questionnaire for NRC Training and Experience Evaluation

Karen--sorry I did not get this back to you sooner. I spoke to both Dr. Mudge and Dr. Delonga. They had the same feelings as Camp Lejeune. They felt the topics were covered in sufficient depth during their residencies. Much of the in depth science topics are above and beyond what is necessary. The safety/administrative topics are appropriate. Hope this helps. Thanks  
Rick

-----Original Message-----

From: Ely, Karen O CIV USN BUMED (US)  
Sent: Friday, April 20, 2018 2:04 PM  
To: Van Way, Ricky L CIV USN NAVHOSP PORS VA (US) <ricky.l.vanway.civ@mail.mil>; Conley, Daniel S LT USN NAVHOSP BREMERTON WA (US) <daniel.s.conley6.mil@mail.mil>; Alfonso, Ernesto Hernandezjr CIV USN NAVHOSP CAMPEN CA (US) <ernesto.h.alfonso.civ@mail.mil>; Cooper, Barry A CIV USN NAVHOSP PENSACOLA FL (US) <barry.a.cooper.civ@mail.mil>; Major, Devin J LT USN NAVHOSP OKINAWA JA (US) <devin.j.major.mil@mail.mil>; Russell, Brandon J LT USN NAVHOSP GU (US) <brandon.j.russell7.mil@mail.mil>; Fong, Raynard K CIV USN NAVMEDCEN SAN CA (US) <raynard.k.fong.civ@mail.mil>; Tuttle, Tai M LT USN NAVHOSP CLNC (US) <tai.m.tuttle.mil@mail.mil>; Harden, Gary W CIV (US) <gary.w.harden.civ@mail.mil>  
Cc: Straiff, Walt CIV USN NAVHOSP BREMERTON WA (US) <walt.straiff.civ@mail.mil>; Delzer, Jeffrey A LCDR USN NAVMCPUBHLHCEN PORS (US) <jeffrey.a.delzer.mil@mail.mil>  
Subject: FW: [Non-DoD Source] REQUEST: Input on Questionnaire for NRC

## Training and Experience Evaluation

I realize that this is a very short turnaround, however, if you could look at this questionnaire and let your authorized users read this questionnaire I would appreciate it. Read the email string below. NRC is letting us comment on the training and experience requirements for authorized users under 10 CFR 35.390. If your command has responses please forward them to me by close of business on Thursday April 26 so that I can compile the responses and send to Mr. Seeley at NRC on Friday April 27. Thank you in advance for your diligence.

V/R,

Karen

Karen O. Ely  
Health Physicist, Radiation Health Team  
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-----Original Message-----

From: Delzer, Jeffrey A LCDR USN NAVMCPUBHLTHCEN PORS (US)  
Sent: Wednesday, April 18, 2018 8:18 AM  
To: Ely, Karen O CIV USN BUMED (US) <karen.o.ely.civ@mail.mil>  
Subject: Fwd: [Non-DoD Source] REQUEST: Input on Questionnaire for NRC Training and Experience Evaluation

Begin forwarded message:

From: "Seeley, Shawn" <Shawn.Seeley@nrc.gov  
<<mailto:Shawn.Seeley@nrc.gov>> >  
Date: April 18, 2018 at 4:53:49 AM PDT  
To: "Sanders, Jerry N CDR NAVSEA, SEA 04 (jerry.n.sanders@navy.mil  
<<mailto:jerry.n.sanders@navy.mil>>)" <jerry.n.sanders@navy.mil  
<<mailto:jerry.n.sanders@navy.mil>> >, "Fragoso, Lino CIV OPNAV, N455"  
<lino.fragoso@navy.mil <<mailto:lino.fragoso@navy.mil>> >, "Delzer, Jeffrey A  
LCDR USN NAVMCPUBHLTHCEN PORS (US)" <jeffrey.a.delzer.mil@mail.mil  
<<mailto:jeffrey.a.delzer.mil@mail.mil>> >  
Cc: "Ayoade, Maryann" <maryann.ayoade@nrc.gov  
<<mailto:maryann.ayoade@nrc.gov>> >, "Wu, Irene" <Irene.Wu@nrc.gov  
<<mailto:Irene.Wu@nrc.gov>> >, "Elliott, Robin" <Robin.Elliott@nrc.gov  
<<mailto:Robin.Elliott@nrc.gov>> >, "Janda, Donna" <Donna.Janda@nrc.gov  
<<mailto:Donna.Janda@nrc.gov>> >  
Subject: [Non-DoD Source] REQUEST: Input on Questionnaire for NRC Training and Experience Evaluation

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

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CAPT Sanders,

Please see the attached documents regarding an evaluation of the training and experience (T&E) requirements in 10 CFR Part 35 by NMSS's medical team. In the Staff Requirements Memorandum, SRM-M170817 (see attached), the Commission directed the staff to evaluate whether it makes sense to establish tailored T&E requirements for different categories of radiopharmaceuticals.

This evaluation is focusing on 10 CFR 35.390, "Training for use of unsealed byproduct material for which a written directive is required." Specifically, the staff is looking at whether the existing alternate pathway requirement of 700 hours (vs. getting certified by a medical specialty board) can be revised for certain categories of radiopharmaceuticals, and still be protective of public health and safety. The staff's response to the SRM is due to the Commission in August 2018.

In response to this SRM, the staff is taking a ground-up approach in determining the categories of radiopharmaceuticals, the appropriate T&E requirements for each category, and whether those requirements should be based on hours of T&E or focused more on competency. The staff is first determining both the fundamental and specific knowledge that is needed to be an authorized user for administering radiopharmaceuticals by developing a list of topics (including some of the topics listed in 10 CFR 35.390).

As part of this effort, the staff is seeking input from various stakeholders to verify that the list of knowledge topics is complete and also get input on how the knowledge should be acquired (hours or competency). These stakeholders include professional medical societies, medical specialty boards, and medical licensees. Attached is a voluntary questionnaire that we are asking for you to send out to your permittees that have authorized users under 10 CFR 35.390 for their input and comments (we would also like your NMCPHC comments as license/permit reviewers). In your response, please do not include any proprietary Information in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding."

Please return their completed questionnaire to Maryann Ayoade at [maryann.ayoade@nrc.gov](mailto:maryann.ayoade@nrc.gov) <<mailto:maryann.ayoade@nrc.gov>> <<mailto:maryann.ayoade@nrc.gov>> and Irene Wu at [irene.wu@nrc.gov](mailto:irene.wu@nrc.gov) <<mailto:irene.wu@nrc.gov>> <<mailto:irene.wu@nrc.gov>> by Friday, April 27, 2018. If you have any questions about this questionnaire, please email or call Maryann Ayoade (301-415-0862) or Irene Wu (301-415-1951).

Please let me know if you have any questions. Thank you for your consideration of assisting us with this endeavor.

Thank you,

Shawn

Shawn W. Seeley, Health Physicist

USNRC

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