

**From:** [Forster, Sara](#)  
**To:** [Bell, Erin](#)  
**Subject:** RE: RE: External: Additional Information Request re Community Health Network, Inc., Lic. No. 13-06009-01, CN621164  
**Date:** Tuesday, July 07, 2020 4:53:00 AM  
**Attachments:** [image011.png](#)

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Thank you for the reply, Ms. Bell. I have brought your concerns (mine also) regarding the NRC Form 313A (AUT) and the Medical Toolkit website. I apologize for the confusion.

In addition, if – in adding an Authorized User (AU) you are only required to submit the Board Certificate, or the Board Certificate plus the 10 CFR 35.300 casework, you need only provide those items, in support of the request. You needn't provide the entire Form 313A (AUD), 313A (AUT), etc.

Sincerely yours,

**Sara A. Forster, Health Physicist Licensing Reviewer**  
U.S. Nuclear Regulatory Commission - Region III  
Division of Nuclear Materials Safety  
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**From:** Bell, Erin <[EBell2@ecommunity.com](mailto:EBell2@ecommunity.com)>  
**Sent:** Monday, July 06, 2020 2:55 PM  
**To:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Subject:** [External\_Sender] RE: External: Additional Information Request re Community Health Network, Inc., Lic. No. 13-06009-01, CN621164

Good afternoon, Ms. Forster.

I know that you mentioned that the ABNM certificate is recognized under 35.390 but not under 392 or 394, but if you look at what I copied you at the bottom of this email thread, there is an asterisk that says "diplomates of this medical specialty board also satisfy the training and experience requirements in 10 CFR 35.392 and 10 CFR 35.394. I understand that your Program Office has requested this information and we will attempt to get it to you within 30 days, but I would request that the website is changed as well as the Form 313, which says to stop once you provide the copy of the board certification.

We will submit this as soon as possible.

Thank you,  
Erin

Erin Bell, MHP, DABSNM  
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**From:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Sent:** Sunday, June 28, 2020 7:53 AM  
**To:** Bell, Erin <[EBell2@ecommunity.com](mailto:EBell2@ecommunity.com)>  
**Subject:** External: Additional Information Request re Community Health Network, Inc., Lic. No. 13-06009-01, CN621164

Dear Ms. Bell:

This message concerns the referenced licensee's amendment request to add the American Board of Nuclear Medicine (ABNM) Board-certified physician Tarun R. Jindal, M.D., as an Authorized User (AU) for medical uses in 10 CFR 35.100, 10 CFR 35.200, and 10 CFR 35.300 (limited to the oral administration of sodium iodide I-131), to the license.

As we had discussed previously, the ABNM certificate is listed as recognized under the 10 CFR 35.390 grouping and not as a board certification recognized under the 10 CFR 35.392 or 10 CFR 35.394 pathways. I have followed up with the NRC's program office regarding the need to submit oral I-131 casework. In response to your inquiry, the Program Office has indicated that it is necessary for an AU qualifying for 10 CFR 35.300 use, with an ABNM certificate, to provide documentation showing a minimum of 3 oral I-131 administration cases, in quantities greater than 33 millicuries.

Accordingly, please provide a signed and dated letter outlining Dr. Jindal's experience (minimum of 3 cases) administering I-131 in quantities of 33 millicuries or less. For each case provided, please list the license number under which the experience was obtained, the facility where the experience was obtained, the quantity administered, the name of the supervising AU, and the date of the administration.

For quickest processing, you may provide the letter as a pdf file attached to an email message. Please provide a response within 30 days of this message (on or before July 28, 2020). As always, do not hesitate to call or email me with any questions you may have.

Sincerely,

**Sara A. Forster, Health Physicist Licensing Reviewer**  
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**From:** Forster, Sara  
**Sent:** Tuesday, May 26, 2020 11:10 AM  
**To:** Bell, Erin <[EBell2@ecommunity.com](mailto:EBell2@ecommunity.com)>  
**Subject:** RE: RE: External: RE: quick licensing question

I apologize for the confusion.... In referring to "three" astericks I meant one for each of all three Boards (ABNM, AOBR, ABR). But my recollection is that the ABR Rad. Onc. Board Cert. is not qualifying for oral I-131/35.394, which is why I feel there may be a typo on that website. I think ABNM is qualifying for the oral I-131/35.394, but I am working on confirming that. This is because the website shows no difference for the two board certs. I will let you know what I find out.

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**From:** Bell, Erin <[EBell2@ecommunity.com](mailto:EBell2@ecommunity.com)>  
**Sent:** Tuesday, May 26, 2020 10:10 AM  
**To:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Subject:** [External\_Sender] RE: External: RE: quick licensing question

Thank you for your response. Below is what is listed in the specialty boards section and it looks like his board should be appropriate. Is there a different section that you are looking at that is specifically for reviewers? You mentioned seeing three asterisks and I'm not seeing that on the NRC website, unless I'm looking at the incorrect section.

Thank you!  
Erin

TOP

#### 35.390 Training for Use of Unsealed Byproduct Material for which a Written Directive is Required

The following are medical specialty boards whose certification process have been recognized by the Commission or an Agreement State and meet the NRC requirements in 10 CFR 35.390, "Training for use of unsealed byproduct material for which a written directive is required."

As part of the NRC-recognition process, the medical specialty boards submit a sample certificate for each recognized specialty area. The certificates are only applicable to the NRC-licensing process when they are issued within the date range. If the certificate or the medical specialty board process changes, then an updated NRC-recognized sample certificate is listed below. The following chart is provided to enable regulators and medical-use licensees to ensure that personnel have met NRC requirements for training and experience.

| Medical Specialty Board Certification Process | Specialty Area      | Sample Certificate for Date Range | Notes  |
|---|---------------------|-----------------------------------|--|
| American Board of Nuclear Medicine            | Nuclear Medicine*   | October 20, 2005 to 2007          | The words "United States" must appear under the certification number.  |
|   |                     | 2007 to present                   |  |
| American Board of Radiology                   | Radiation Oncology* | June 2007 to May 2012             | The words "AU eligible" must appear above the ABR seal.<br><br>After May 2012, the certificate will be recognized for 4 years from the date of issuance and after the 4-year period, the ABR web site <a href="#">(EXIT)</a> should be checked to ensure that the individual is still certified. The ABR monitors the certification status of its diplomates and posts this information on its web site <a href="#">(EXIT)</a> . |
|   |                     | May 2012 to May 2013              |  |
|   |                     | May 2013 to May 2019              |  |
|   |                     | May 2019 to present               |  |
| American Osteopathic Board of Radiology       | Radiation Oncology* | May 1, 2007 to present            | All certifications issued beginning May 1, 2007 have a 10-year time limit from their date of issuance.   |

\*Diplomates of this medical specialty board also satisfy the training and experience requirements in 10 CFR 35.392 and 35.394.

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**From:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Sent:** Friday, May 22, 2020 10:35 AM  
**To:** Bell, Erin <[EBell2@ecommunity.com](mailto:EBell2@ecommunity.com)>  
**Subject:** External: RE: quick licensing question

Good morning, Ms. Bell:

You are correct in your read of the regulations and NRC's listed medical specialty boards. Only the signed and dated request and a Bd. Cert. is required. However, for the I-131 qualifications, I would like to check with our medical team in headquarters to confirm that there is no error in the listed Board Certifications for 10 CFR 35.390 at our website, prior to giving you a final answer. This is because there are three astericks and no entries with no astericks so I am unsure whether the table may have an error. My recollection is that the astericks is correct for the ABNM cert. but not the ABR certs, so your read probably is still accurate. To be confident that all necessary information has been provided, if he has it available, the physician could provide documentation of the dates of three I-131 administrations in quantities greater than 33 millicuries, in addition to the Bd. Certification. This need only be a listing of the dates, quantities, licensee, and supervising AUs, and could be contained in the cover letter.

There is no longer a requirement for a preceptor attestation, for individuals with listed Board Certifications.

I hope that this helps!

**Sara A. Forster, Health Physicist Licensing Reviewer**  
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**From:** Bell, Erin <[EBell2@ecommunity.com](mailto:EBell2@ecommunity.com)>  
**Sent:** Friday, May 22, 2020 9:07 AM  
**To:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Subject:** [External\_Sender] quick licensing question

Hello Ms. Forster,

I just have a quick question: I am wanting to a new Nuc Med AU for 10CFR 35.100, 200, and 300 uses (oral I-131 only). He is board certified by an approved board (The American Board of Nuclear Medicine) and it appears based on the latest version of 10 CFR 35 that he will be able to be approved simply by providing a copy of his board certification, he will not even need documentation of the I-131 procedures that he's administered.

Am I reading this correctly? I feel like I'm missing something, as I did not feel like it was that easy before.

Thanks so much,  
Erin

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