In reviewing the draft documents of the proposed revisions of 10 CFR Part 35, the medical physicist working in nuclear medicine is challenged with the task of identifying areas of potential modification in modus operandi versus those representing status quo. A glance at the draft index indicates that change has indeed occurred with deletion strike-out-lines in this table of contents alone numbering approximately 60. With the NRC's introductory proclamation promising a more risk-informed performance-based regulation focusing on high-risk medical procedures from a radiation safety aspect (with decreased oversight in low-risk activities), there is optimism that relief may have arrived at long last. However, although the deletions are evident, it requires effort to discern the functional additions within the myriad of section shuffling and number changes. Furthermore, it must be recognized that what we are reviewing today was an NRC working group draft submitted for comment. The final proposed revisions for 10 CFR Part 35 may look quite different.

The objective of this presentation is to evaluate the draft revisions in terms of their potential impact on the practice of nuclear medicine physics. The opportunity will be taken to highlight/review the overall responsibilities within the purview of the medical physicist practicing in nuclear medicine as defined by the NRC. The approach will be to provide a broad outline of those activities for which the medical physicist might be responsible within a nuclear medicine facility although individual assignments may or may not involve the physicist depending upon the specific organizational structure and institutional program for delegation of duties. Detailed emphasis will be directed towards the significance of the proposed changes in such areas as, for example: training for medical physicists; training for authorized users and physicians with implications concerning the involvement of the medical physicist; surveys and equipment calibration (fixed and mobile facilities); reporting requirements for medical events (no longer referred to as misadministrations) requiring calculational work up; decay-in-storage regulations; and, the maintenance of records (now moved into one dedicated sub part).

Educational Objectives:

1. To review the proposed changes in 10 CFR Part 35 as relevant to the medical physicist practicing in nuclear medicine, and,
2. To evaluate the potential impact of the proposed changes on the practice of nuclear medicine physics.