

## **THE DECISION MAKING FRAMEWORK FOR NRC T&E REQUIREMENTS**

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## **The Nuclear Regulatory Commission**

- **Energy Reorganization Act of 1974**
- **Promotional functions separated from regulatory functions**
- **“Independent” agency**
- **Commercial nuclear power plants; fuel cycle facilities; medical, academic, and industrial use; transport, storage, and disposal of radioactive material**

## **NRC Organizational Framework**

- **Five member Commission**
- **Executive Director of Operations**
- **Office of Federal and State Materials and Environmental Management Programs**
- **Office of the General Counsel**
- **Advisory Committee on Medical Uses of Isotopes**
- **Agreement States**

## **NRC Regulatory Framework**

- **10 CFR Part 35 – Medical Use of Byproduct Material**
- **Training and Experience Requirements**
- **Regulatory guidance and information**
- **Agreement State compatibility, April 29, 2008 deadline**
- **10 CFR 2.802 – Petition for Rulemaking**

## Training and Experience Requirements

- **Three pathways**
  - **Specialty Board certification**
  - **Evaluation of an individual's training and experience – the "alternate pathway"**
  - **Identification of an individual's approval on an existing license**

## Preceptor Attestation, aka Preceptor Statement

- **Required for both the board certification pathway and the "alternate" pathway**
- **From a Radiation Safety Officer, Authorized Medical Physicist, Authorized Nuclear Pharmacist, or Authorized User**
- **To the effect that the individual has completed the required training and has achieved a level of knowledge and competency sufficient to function independently**

## Preceptor Attestation Issues

- **The need for a preceptor statement at all for the board certification pathway**
- **The need for the preceptor statement to address the individual's level of competency**
- **Compliance and enforcement**

## Grandfathering of Existing Board Certified Individuals (1)

- **10 CFR 35.57 grandfathers certain individuals from the training and experience requirements**
- **AAPM Petition for Rulemaking submitted under 10 CFR 2.802, September 10, 2006**
- **Public comments have been submitted on the petition, PRM-35-20**
- **NRC staff currently evaluating the petition and the comments**
- **NRC evaluation process consists of a Working Group and a Petition Review Board**

## Grandfathering (2)

- **AAPM petition requests two revisions to the existing rule**
  - recognize all medical physicists certified by either the American Board of Radiology or the American Board of Medical Physics on or before October 24, 2005
  - recognize all diplomates that were certified by the named boards in Subpart J for RSO who have relevant timely work experience even if they have not been formally named as an RSO

## Other Developments (1)

- **Advisory Committee on Medical Uses of Isotopes teleconference on T&E issues, August 16, 2007, 1:00 p.m. to 3:30 p.m.**
  - **Phone number (800) 638-8081**
  - **Passcode 6951#**

## Other Developments (2)

- **NRC staff encouraging non-listed Medical Physicists to seek Authorized Medical Physicist status**
- **NRC staff encouraging non-listing Agreement states to list Authorized Medical Physicists**
- **Simplifying NRC Form 313A**
- **Encouraging Boards that certify Medical Physicists to identify diplomates seeking AMP or RSO status whose documented T&E satisfy the NRC requirements**