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ENFORCEMENT BULLETIN 2008-01

To: Medical and Nuclear Pharmacy Licensees

From: Terry D. Lindsey, Manager

Radiation Protection Services Section

Subject: Provisions for documentation of training and experience to identify individuals on a license as an Authorized User (AU), Radiation Safety Officer (RSO), Authorized Nuclear Pharmacist (ANP), or Authorized Medical Physicist (AMP)

Background
The regulations in 10 CFR Part 35 identify two main training and experience (T&E) pathways for new individuals seeking recognition as authorized individuals.

1. Board Certification Pathway
Individuals who have received certification from a NRC recognized board certification program will only need to complete the Preceptor Attestation section on NRC’s 313A form.

2. Alternate Pathway
The candidate demonstrates directly to the NRC (or Agreement State) that all T&E requirements specified in 10 CFR Part 35 have been completed. This is done by using the NRC’s 313A series of forms to document the authorization(s) requested.

Experienced AUs, RSOs, ANPs, and AMPs
An applicant or licensee that is adding an experienced authorized user for a medical use(s) license only needs to provide evidence that the individual is listed on a medical use license issued by the NRC or Agreement State provided that the individual is authorized for the same areas of use requested in the application as described in 10 CFR 35.59.

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Applicants are encouraged to go to the NRC public web site for the most recent versions of the NRC Form 313A series of forms and guidance for completing these forms at http://www.nrc.gov/materials/miau/med-use-toolkit.html.

Recentness of Training
The required training and experience, including board certification, described in 10 CFR Part 35 must be obtained within the 7 years preceding the date of the application, or the individual must document having had related continuing education, retraining, and experience since obtaining the required training and experience.

- Successful completion of classroom and laboratory review courses that include radiation safety practices relative to the proposed type of authorized use;

- Practical and laboratory experience with patient procedures using radioactive material for the same use(s) for which the applicant is requesting authorization;

- Practical and laboratory experience under the supervision of an Authorized User (AU) at the same or another licensed facility that is authorized for the same use(s) for which the applicant is requesting authorization; and

- For therapy devices, experience with the therapy unit and/or comparable linear accelerator experience and completion of an in-service review of operating and emergency procedures relative to the therapy unit to be used by the applicant.