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10 CFR Part 35 Requirements for Training and Qualification of RSOs

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Shawn W. Googins, Board Member*

The recent changes to 10 CFR Part 35 that were promulgated by the Nuclear Regulatory Commission (NRC) contain new training and experience requirements for Radiation Safety Officers (RSO). As currently written, none of the certification programs alone will meet the requirements for qualification as an RSO under 10 CFR 35.50. In June 2001, the American Board of Health Physics (ABHP) petitioned the NRC to recognize ABHP certification as sufficient to meet the regulatory requirements to qualify as an RSO under Part 35. The Board received a reply from the NRC in May 2002, which rejected the Board's arguments for recognition.

The Advisory Committee on the Medical Use of Isotopes (ACMUI) examined this issue in more detail and developed recommendations on revisions to the training and experience requirements for Part 35 RSOs. Richard Vetter, ACMUI member, solicited input from the ABHP, the American Board of Radiology (ABR),

the American Board of Medical Physics (ABMP), and the American Board of Scientists in Nuclear Medicine (ABSNM) in developing these recommendations. A consolidated position was developed which specifically listed certifications of the ABHP, ABMP, ABR, and ABSNM as meeting the training and experience requirements for RSOs on Part 35 licenses.

The ACMUI held a hearing on this subject on June 21st in Rockville, Maryland. Board member Shawn Googins attended the hearing on behalf of the ABHP. Representatives of the ABR, ABMP, and ABSNM were also in attendance. The ABHP, ABR, ABMP, and ABSNM joined together to unanimously endorse the draft ACMUI recommendations. The Boards presented a consolidated position reflecting our belief that our respective certifications are sufficient to assure qualification for the position of Radiation Safety Officer on a Part 35 license.

The current Part 35 regulations have removed the listings of various board certifications as meeting the training and experience requirements for the position of RSO. The ACMUI Subcommittee recommendations seek to restore the board certifications as satisfying the prerequisites for RSO training and experience. In addition, the recommendations require that the individual RSO has received training or has experience in the use of by-product material or specific modalities similar to those identified on the applicable license. The ABHP considers this additional requirement to be covered by the Code of Ethics, which states, “Each CHP has a professional and ethical obligation to practice only in those areas in which he or she is competent.”

Further information can be found on the NRC's Web site (<http://www.nrc.gov/what-we-do/regulatory/advisory/acmui.html>).

