



Training and Experience Attestations

Donna-Beth Howe, Ph.D.

April 11, 2011

T & E Attestations

2002 Final Part 35 Rule

- Introduced statements for all pathways certifying completion of T & E and individuals were competent to function independently as authorized individual**

T & E Attestations

2005 Revision of Part 35

- Retained statements for all pathways but removed statement from certification process and revised statement to be an attestation**

T & E Attestations

Requires each individual have a written attestation, signed by a preceptor authorized ..., that the individual has satisfactorily completed the board or alternate pathway T & E requirements in ..., and achieved a level of competency sufficient to function independently as an authorized

April 29, 2008 ACMUI Commission Meeting

- Does each individual have to have a written attestation?
- Does each attestation have to be signed by a preceptor authorized individual?
- Does each attestation have to attest that the individual has achieved a level of competency sufficient to function independently as an authorized ...?

Commission Direction

- **SRM M080429, May 15, 2008:**
Coordinate with ACMUI & AS to amend preceptor requirements in 10 CFR 35
- **SECY-08-0179, November 20, 2008:**
Recommendations on amending preceptor attestation requirements
- **SRM SECY-08-0179, January 16, 2009:**
Approved recommendations

Conceptually...

- **Eliminate written attestation for board certification pathway**
- **Revise the attestation to say... has demonstrated the ability to function independently to fulfill the radiation safety related duties required by the licensee**
- **Residency program directors can sign attestations if ...**

Discussion

- **Comment on the conceptual direction**
- **Potential Rulemaking Challenges**
 - **Unintended consequences**
 - **The certification program may not adequately cover NRC's regulated modalities**
 - **Perceived relaxation of safety requirements?**

Supplemental Information

T & E Attestations

- 10 CFR 35.50, 35.51, 35.55, 35.190, 35.290, 35.390, 35.392, 35.394, 35.396, 35.490, 35.690**

Supplemental Information

SRM M080429, May 15, 2008

- Staff should work with ACMUI and Agreement States on amending NRC's requirements for preceptor attestation for both board certified individuals and for individuals seeking authorization via the alternate pathway**

Supplemental Information

SECY-08-0179, November 20, 2008

- Recommendations on Amending
Preceptor Attestation Requirements in
10 CFR Part 35 Medical Use of
Byproduct material**

Supplemental Information

SRM SECY-08-0179, January 16, 2009

- Commission approved recommendation for amending the preceptor attestation requirements**

Acronyms

- **ACMUI: Advisory Committee on the Medical Uses of Isotopes**
- **AS: Agreement States**
- **CFR: Code of Federal Regulations**
- **SECY: Office of the Secretary**
- **SRM: Staff Requirements Memorandum**
- **T & E: Training and Experience**