

The NRC is Seeking Input on its Evaluation of Training and Experience for Authorized Users



Training and Experience Requirements

The NRC's training and experience (T&E) requirements in Subpart E of Title 10 of the *Code of Federal Regulations* Part 35 provide three ways that a physician can be authorized to administer unsealed byproduct materials or radiopharmaceuticals requiring a written directive:

- 1) A physician can be certified by a medical specialty board, whose certification process is recognized by the NRC or an Agreement State.
- 2) A physician can complete a structured educational program and supervised work experience under an alternate pathway. The required 700 hours breaks down to a minimum of 200 hours of classroom and laboratory training, and 500 hours of supervised work experience.
- 3) A physician can be authorized if previously identified as an authorized user on an NRC or Agreement State license or permit (i.e., grandfathered).

The NRC is Evaluating the Alternate Pathway T&E Requirements

The NRC is determining whether it makes sense to establish tailored T&E requirements for different categories of radiopharmaceuticals.

If so, how should those categories be determined (such as by risks posed by groups of radionuclides or by delivery method)?
What would the appropriate T&E requirements be for each category?

Should those requirements be based on hours of T&E or focused more on competency?

How Can You Share Your Input on the T&E Requirements?

- A *Federal Register* notice providing questions for consideration and instructions on how to submit your comments will be published on October 29, 2018, at www.federalregister.gov. This will begin a 90-day public comment period.
- Participate in NRC public meetings & webinars scheduled for November 14, December 11, January 10, and January 22. Meeting notices will be posted at <https://www.nrc.gov/pmns/mtg> at least 10 days before each meeting.
 - The NRC's T&E evaluation Web site will provide links to everything you need to participate in the evaluation: www.nrc.gov/materials/miau/med-use-toolkit/training-experience-evaluation.html