Overview

During the review of the proposed Training and Experience (T&E) regulations for 10 CFR Part 35, discussion was raised regarding the establishment of the initial pool of authorized medical physicists who could serve as preceptors under the new T&E regulations. A review of current Agreement State (AS) licensing programs, resulted in confirmation that very few medical physicists were listed on licenses by name. This results in a short supply of medical physicists to serve as preceptors, since the proposed T&E regulations require a medical physicist to be currently listed on an NRC or Agreement State license as an Authorized Medical Physicist (AMP) to function as a preceptor.

The CRCPD Board of Directors tasked SR-G to develop proposed licensing language that might be used when adding authorized medical physicists to licenses.

Recommendations

It is recommended that Agreement States use the following license conditions, or equivalent for listing individuals currently working as medical physicists. In order for this approach to work to increase the pool of AMPs, it is necessary that amendments be made to licenses before the new 10 CFR 35 T&E regulations are adopted by the state.

For a Specific Medical License

The Authorized Medical Physicist(s) for activities authorized by this license are: insert name, and authorized activity or modality.

For example:
- John Smith, Gamma stereotactic radiosurgery
- Tom Jones, Ophthalmic use of Sr-90; High dose rate brachytherapy using a remote afterloader
- Mary Sharp, Intravascular brachytherapy

For a Broad-Scope Medical License

Individuals designated to work as medical physicists shall have completed device specific training, met the training and experience criteria established in 10 CFR Part
35.961 and recentness of training criteria established in 10 CFR Part 35.59, (or equivalent agreement state requirements) and shall be designated, in writing by the licensee’s Radiation Safety Committee. The licensee shall maintain a list of Authorized Medical Physicists and the activities for which they are approved.

The task force recommends that the criteria outlined in 10 CFR 35.961, “Training for Teletherapy physicist” be followed when approving Authorized Medical Physicists during the interim period before 10 CFR 35 T&E requirements are adopted, and additionally that documentation of device specific training be requested.

**Device Specific Training**

The task force recommends that the following types of information be deemed acceptable for documenting device specific training.

1. Signed preceptor statement
2. Letter from a residency or graduate program administrator attesting to completion of training
3. Certificate of manufacturers training
4. CAMPEP approved continuing education
5. Documentation of years of experience (manual brachytherapy and teletherapy)
6. Documented approval of the Radiation Safety Committee of a broad scope licensee indicating approved activity.
   a. Minutes of the Radiation Safety Committee
   b. Letter signed by the Chairman of the Radiation Safety Committee attesting to the approval.