UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 27, 2022

MEMORANDUM TO: Daniel H. Dorman
                   Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary

SUBJECT: STAFF REQUIREMENTS – SECY-20-0005 – RULEMAKING
                   PLAN FOR TRAINING AND EXPERIENCE REQUIREMENTS
                   FOR UNSEALED BYPRODUCT MATERIAL (10 CFR PART 35)

The Commission has approved Option 1, which maintains the NRC's current training and experience requirements for use of unsealed byproduct material in Title 10 of the *Code of Federal Regulations* Part 35, "Medical Use of Byproduct Material."

As part of the "Rulemaking Plan to Establish Requirements for Rubidium-82 Generators and Emerging Medical Technologies" approved by the Commission in the staff requirements memorandum (SRM) for SECY-21-0013, the staff should reconsider the full complement of training and experience requirements within the current paradigm and obtain stakeholder comments on the knowledge topics encompassing the safety related characteristics of emerging medical technologies required for Authorized Users to fulfill their radiation safety-related duties and supervision roles; the methods on how knowledge topics should be acquired; and consideration for continuing education, vendor training for new medical uses, and training on the NRC regulatory requirements.

In accordance with staff procedure MSST-70-03 Procedures for Recognizing, Monitoring, and Terminating the Certification Process of Specialty Boards, the staff should complete an evaluation of whether each specialty board still satisfies the board recognition criteria and report its findings to the Commission within six months of the date of the Staff Requirements Memorandum.

The staff should develop implementation guidance to clarify expectations on how individuals fulfill training and experience requirements and clarify the roles and responsibilities of persons subject to training and experience requirements.

cc: Chairman Hanson
     Commissioner Baran
     Commissioner Wright
     OGC
     CFO
     OCA
     OPA