



# 10 CFR Part 35 Training and Experience

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# Purpose

Recently there have been significant changes in the way individuals are provided training to fulfill certain training and experience (T&E) requirements. Many providers of such training now deliver all or a portion of the training online, and with this new delivery method comes new challenges for the regulators. This presentation will discuss NRC and Agreement State efforts to ensure that the requirements are complied with in this new environment.

## Background

- Part 35 Training & Experience Requirements found in Sections 190, 290, 390, 392, 394, 490, 491, 590, 690
- Requirements may include:
  - Certification by a specialty board recognized by the NRC or an Agreement State, or
  - Completion of a specified number of hours of T&E, passed an exam by the specialty board, or

# Background

- Completed the specified number of hours of T&E, including specified minimum hours of training in radionuclide handling techniques, and work experience under an authorized user

## Alternate Pathway

- 35.396 - Individuals must have a full 80 hours of training on radiation protection related subjects

# Approval of Training Programs

- Some States approve training programs
- NRC and remaining States do not approve, but review training programs

# Licensee Responsibilities

- Ensuring an individual meets T&E requirements
- Ensuring that individual is qualified in all required areas when already listed on NRC/State license

## The Concerns

- Adequacy of online training provided by various companies used to meet the 80 hours of radiation safety training required of certain individuals under Part 35
- Adequacy of certifying board checks of their training requirements as well as their verification that individuals have meet all board certification requirements

# Results of the Review of the Concerns

- The review did not reveal many actual certification issues
- A number of *potential* pitfalls were identified

## Potential Pitfalls

- Training certificates say “80 hour equivalent”
- 80 hours not only on topics prescribed by the regulations
- Accounting for 80 hours of participation for online courses
- Course accepted without recent review for changes

# Potential Pitfalls

- Poor eligibility checks conducted by certification board, allowing for unqualified individual to sit for the exam

# Conclusions

- Regulators should:
  - ensure that online training programs used in their jurisdiction provide the full clock hours of training specified in the regulations
  - ensure that online training programs verify participants are present during the entire course
  - Periodically review courses to ensure they cover required topics and length of time

## A Special Thank You

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