

George J. Kelen, M.D., F.A.C.C.

August 20, 2007

UNITED STATES NUCLEAR REGULATORY COMMISSION Region III, Materials Licensing Section 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

Re: Amendment to License No. 21-32560-01, George J. Kelen, M.D., PLLC

Please amend our license as follows:

- 1. Remove William LaPenna, M.D. as authorized user and Radiation Safety Officer. He will be leaving our facility August 31, 2007.
- 2. Add David B. Johnson, M.D. as authorized user of 10 CFR 35.100 and 35.200. He is currently listed as an authorized user on license number 21-36543-01.
- 3. Add David B Johnson, M.D. as Radiation Safety Officer. Form 313A (RSO) is enclosed for your review.

Thank you for your cooperation in this matter. If you have any questions, please contact our consulting physicist, Dawn Edwards at 734-662-3197.

Sincerely,

George J. Kelen, M.D.

RECEIVED AUG 2 9 2007

Mailing address: 913 E. Ludington Avenue, Ludington, Michigan 49431 Phone: 231-845-7677 • Fax: 231-843-0773 • Iscardiology@t-one.net



George J. Kelen, M.D., F.A.C.C.

August 20, 2007

Re: Radiation Safety Officer / Executive Management

Letter of Understanding

Dear David B. Johnson, M.D.:

You have been appointed the Radiation Safety Officer (RSO) of this facility for our United States Nuclear Regulatory Commission Materials License. This "Letter of Understanding" is prepared to comply with Title 10 Code of Federal Regulations (CFR) Part 35.24(b). This section of the regulations requires that you agree in writing to the following:

- > Assume responsibility for implementing the Radiation Protection Program
- > Ensure that radiation safety activities are being performed in accordance with our own approved procedures and all regulatory requirements.

Furthermore, in compliance with 10 CFR 35.24(e),(g), the executive management of this facility agrees to provide you as RSO:

- > Specific written notation of your authority, duties and responsibilities, see attached.
- Sufficient authority, organizational freedom, time, resources and management prerogative to:
  - 1. Identify radiation safety problems;
  - 2. Initiate, recommend, or provide corrective actions:
  - 3. Stop unsafe operations; and,
  - 4. Verify implementation of corrective actions.

Our signatures noted below will attest to the issues noted above. Please make a copy of this document for your files and return the original to my attention.

Sincerely,

Georgé J. Kelen, M.D.

David B. Johnson, M.D.

NRC FORM 313A (RSO) 2-2007)	U.S. NUCLEAR REGULATORY COMMISSIO	N	
RADIATION SAFETY OFFIC AND PRECEP	CER TRAINING AND EXPERIENCE TOR ATTESTATION CFR 35.50]	APPROVED BY EXPIRES: 10/3	Y OMB: NO. 3150-0120 31/2008
Name of Proposed Radiation Safety Officer			
David B. Johnson, M.D.			
	authorizes the following medical uses (check a		
	5,300 35,400 35,500	35.600 (remote	afterloader)
35.600 (teletherapy) 35.600	5.600 (gamma stereotactic radiosurgery)	35.1000 (	)
	PART I - TRAINING AND EXPERIENCE (Select one of the four methods below)		
*Training and Experience, including boa	rd certification, must have been obtained within btained related continuing education and expert education, and description of continuing	ience since the	required training
1. <u>Board Certification</u>			
a. Provide a copy of the board cert			
<ul> <li>b. Use Table 3.c. to describe traini all types of medical use on the I</li> </ul>	ng in radiation safety, regulatory issues, and er icense.	nergency proce	dures for
c. Skip to and complete Part II Pre	ceptor Attestation.		
	OR		
2. Current Radiation Safety Office Officer for the Additional Media	er Seeking Authorization to Be Recognized a cal Uses Checked Above	as a Radiation :	Safety
<ul> <li>a. Use the table in section 3.c. to procedures for the additional t</li> </ul>	describe training in radiation safety, regulatory ypes of medical use for which recognition as R	issues, and em SO is sought.	nergency
b. Skip to and complete Part II P	receptor Attestation.		
3 Structured Educational Progra	OR m for Proposed Radiation Safety Officer		!
a. Classroom and Laboratory Tra			:
Description of Training	Location of Training	Clock Hours	Dates of Training*
Radiation physics and instrumentation			
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Radiation biology			
Radiation dosimetry			
	Total Hours of Training:		

## RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

## 3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

b. Supervised Radiation Safety Experience (If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)

Description of Experience	Location of Training/ License or Permit Number of Facility	Dates of Training*
Shipping, receiving, and performing related radiation surveys		
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides		
Securing and controlling byproduct material		
Using administrative controls to avoid mistakes in administration of byproduct material		
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures		
Using emergency procedures to control byproduct material		
Disposing of byproduct material		
Licensed Material Used (e.g., 35.100, 35.200, etc.)+		

Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes and quantities used: 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 remote afterloader units, 35.600 teletherapy units, 35.600 gamma stereotactic radiosurgery units, emerging technologies (provide list of devices).

C FORM 313A (RSO) <sup>07)</sup> RADIATION SAFETY OFFICER TRAINING AND		GULATORY COMMISSION ATION (continued)	
Structured Educational Program for Propose			
b. Supervised Radiation Safety Experience (co			
	ecessary to document supervised work experie	ence, provide multiple	
Supervising Individual	License/Permit Number listing supervising Radiation Safety Officer	License/Permit Number listing supervising individual as a Radiation Safety Officer	
This license authorizes the following medical us	; ;es:		
35.100 35.200 35.300	35.400		
35.500 35.600 (remote afterloader)	) 35.600 (teletherapy)		
35.600 (gamma stereotactic radiosurgery)	35.1000 (	i	
c. Describe training in radiation safety, regulate use on the license.		ypes of medical  Dates of	
Description of Training	Training Provided By	Training*	
Radiation safety, regulatory issues, and emergency procedures for 35.100, 35.200, and 35.500 uses			
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses			
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses			
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses			
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses			
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses			
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):			

RC FORM 313A (RSO)  -2007)  U.S. NUCLEAR REGULATORY COMMISSION 1				
RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)				
3. Structured Educational Program for Proposed Radiation Safety Officer (continued)				
c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)				
Supervising Individual If training was provided by supervising RSO, AU, AMP, or ANP. (If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.)				
License/Permit lists supervising individual as:				
Radiation Safety Officer Authorized User Authorized Nuclear Pharmacist  Authorized Medical Physicist				
Authorized as RSO, AU, ANP, or AMP for the following medical uses:				
☐ 35.100 ☐ 35.200 ☐ 35.300 ☐ 35.400				
35.500 35.600 (remote afterloader) 35.600 (teletherapy)				
35.600 (gamma stereotactic radiosurgery) 35.1000 ()				
d. Skip to and complete Part II Preceptor Attestation.  OR				
4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist identified on				
the licensee's license				
a. Provide license number.				
b. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.				
c. Skip to and complete Part II Preceptor Attestation.				
PART II – PRECEPTOR ATTESTATION				
Note: This part must be completed by the individual's preceptor. The preceptor does not have to be the supervising individual as long as the preceptor provides, directs, or verifies training and experience required. If more than one preceptor is necessary to document experience, obtain a separate preceptor statement from each.				
First Section				
Check one of the following:  1. Board Certification				
I attest that has satisfactorily completed the requirements in  Name of Proposed Radiation Safety Officer				
10 CFR 35.50(a)(1)(i) and (a)(1)(ii); or 35.50 (a)(2)(i) and (a)(2)(ii); or 35.50(c)(1).				
OR				
2. Structured Educational Program for Proposed Radiation Safety Officers				
l attest that  Name of Proposed Radiation Safety Officer  has satisfactorily completed a structural educational				
program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).				
OR				

NRC FORM 313A (RS	0)	U.S. NUCLEAR REGULATORY COMMISSION			
RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)					
Preceptor Attestat	Preceptor Attestation (continued)				
First Section (cont Check one of the f					
3. Additiona	l Authorization as Radiation	Safety Officer			
✓ I attest that	David B.Johnson, M.D.  Name of Proposed Radiation Safet	is an  Officer			
<b>✓</b> Auti	norized User	Authorized Nuclear Pharmacist			
Auth	norized Medical Physicist				
aspects		has experience with the radiation safety duct material for which the individual has s			
		AND			
Second Section Complete for all (6	check all that apply):				
✓ I attest that	David B. Johnson, M.D.  Name of ProposedRadiation Safety Offi	has training in the radiation safety, regulatory issues, and			
emergency pro	ocedures for the following types				
<b>3</b> 5.100					
<b>√</b> 35.200					
35.300	oral administration of less that which a written directive is re-	n or equal to 33 millicuries of sodium iodide I-131, for quired			
35.300	oral administration of greater	than 33 millicuries of sodium iodide I-131			
35.300	parenteral administration of a a photon energy less than 15	ny beta-emitter, or a photon-emitting radionuclide with 0 keV for which a written directive is required			
35.300	parenteral administration of any other radionuclide for which a written directive is required				
35.400					
35.500					
35.600	remote afterloader units				
35.600	teletherapy units				
35.600	gamma stereotactic radiosur	gery units			
35.1000	emerging technologies, inclu-	ding:			

NRC FORM 313A (RSO)	U.S. NUCLEAR REGULATORY CO	NOISSIMMC
(2-2007) RADIATION SAFETY OFFICER TR	RAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (con	tinued)
	AND	
Third Section Complete for ALL		
✓ I attest that David B. Johnson, M.I		ļ
sufficient to function independently	ly as a Radiation Safety Officer for a medical use licensee.	
Fourth Section Complete the following for Preceptor		
I am the Radiation Safety Officer for	West Michigan Heart, P.C.  Name of Facility	
License/Permit Number: 21-26543-01	realite of r ability	
Name of Preceptor  Daniklanklz	Signature Telephone Number Date	/22/07

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UNITED STATES NUCLEAR REGULATORY CO
2443 WARRENVILLE RD, SUITE 210
REGION III, OFFICE OF MATERIAL LICE
LISLE IL 60532-4352 IL 603 9-03 **UPS GROUND** TRACKING #: 1Z TV0 505 03 9501 0613 BILLING: P/P

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