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Dennis P. O'Dowd Health Physicist MATERIALS LICENSING BRANCH

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NUCLEAR REGULATORY COMMISSION REGION III 2443 WARRENVILLE ROAD LISLE, ILLINOIS 60532-4351

(630) 829-9573 FAX: (630) 515-1078

SSION # PAGES: _____ TEL.: _(906) 488-4431__

FAX #: (906) 485-2370

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TELECON & FAX TRANSMITTAL

COMPANY: Bell Memorial Hospital

Robert Frechetti, Manager, Radiology Dept.

TO: Steve Hill, Nuclear Medicine Dept. or

EMAIL:

CONVERSATION RECORD	janger geging plasie, geging gener sourff	TIME DATE 11:09 am January 13, 2011
NAME OF PERSON(3) CONTACTED Bob Frachetti, Manager Radiology Department	(906) 485-2635	ORGANIZATION Bell Mernorial Hospital

SUBJECT

License No.: 21-02037-03

[Control No.: 576275

SUMMARY

We have reviewed your faxed document dated January 13, 2012, submitted in response to our request for additional information relative to letter dated October 3, 2011, requesting that Todd K. Bostwick, M.D. be named as Radiation Safety Officer (RSO) on the license. In order to complete the processing this request, still further information is needed.

The submitted NRC Form 313A (RSO), signed by RSO preceptor Julia (Shan) Mariette, does not attest to Dr. Bostwick's training in the radiation safety, regulatory issues, and emergency procedures for ALL uses and materials authorized in 35.300. Specifically, although necessary attestations were provided for 35.300 uses involving oral administration of I-131, the preceptor attestation did not include parenteral administration of any beta-emitter, or photon-emitting radionuclide with a photon energy less than 150 keV for which a written directive is required. As NRC License No. 21-02037-03 authorizes all 35.300, and Dr. Bostwick is authorized for all 35.300 uses and materials under the license, it is necessary that this training be obtained in order to proceed with designating Dr. Bostwick as the RSO for this license.

Please provide documentation that this training has been obtained, signed by a preceptor authorized for 35,300.

We request that you submit the completed information via facsimile to (630) 515-1078. In your response, please be certain to reference Control No. <u>576275</u>, as listed at the top of this memo. We expect to hear from you no later than January 18, 2012.

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Please direct any questions you have to me at (630) 829-9573 or dennis.o'dowd@nrc.gov.

NAME OF PERSON DOCUMENTING CONVERSATION

(DATE January 13, 2011

Dennis P. O'Dowd, Health Physicist Materials Licensing Branch NRC RIII/DNMS

NRC FORM 313A (RSO)	U.S. NUCLEAR REGULATORY COMMISSION		
RADIATION SAFETY OFFIC AND PRECEF	CER TRAINING AND EXPERIENCE PTOR ATTESTATION CFR 35.50]	APPROVED B EXPIRES: MM	Y OMB: NO. 3150-0120 N/DD/YYYY
Name of Proposed Radiation Safety Officer			
	TWICK	and the state of the	
	authorizes the following medical uses (check all th		- .
∑ 35.100 35.200 243	المعينا المسيبا المعينا	5.600 (remote	afterloader)
		5.1000 ()
	PART I TRAINING AND EXPERIENCE (Select one of the four methods below)		
*Training and Experience, including boa application or the individual must have o	and certification, must have been obtained within th obtained related continuing education and experier e dates, duration, and description of continuing ed	nce since the	required training
1. Board Certification			
a. Provide a copy of the board cer			
 b. Use Table 3.c. to describe training all types of medical use on the I 	ing in radiation safety, regulatory issues, and emer icense.	rgency proce	dures for
c. Skip to and complete Part II Pre	ceptor Attestation.		
 Officer for the Additional Medic a. Use the table in section 3.c. to procedures for the additional to b. Skip to and complete Part II Procedures 	o describe training in radiation safety, regulatory iss ypes of medical use for which recognition as RSO receptor Attestation. OR	sues, and em	
a. Classroom and Laboratory Tra	m for Proposed Radiation Safety Officer ining		
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:		

NRC FORM 313A (RSO) (M-YYYY)

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FORM 313A (RSO)	U.S. NUCLEAR RI	GULATORY COMMISS
RADIATION SAFETY OFFICER TRAINING A	ND EXPERIENCE AND PRECEPTOR ATTEST	ATION (continued
Structured Educational Program for Propo	sed Radiation Safety Officer (continued)	
b. Supervised Radiation Safety Experience	(continued)	
(If more than one supervising individual is copies of this section.)	necessary to document supervised work experie	ance, provide multip
Supervising Individual	License/Permit Number listing supervisi Radiation Safety Officer	ng individual as a
This license authorizes the following medical	uses:	
35.100 \$35.200 \$35.300		
35.500 35.600 (remote afterloade		
35.600 (gamma stereotactic radiosurgery)		
c. Describe training in radiation safety, regula	atory issues, and emergency procedures for all t	ypes of medical
use on the license.		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	JULIA (SHAN) MARLETTE	1/12/12
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		

NRC FORM 313A (RSO) (M-YYYY)

U.S. NUCLEAR REGULATORY COMMISSION

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 desc 35.600 remote afterloader units, 35.600 teletherapy units, list of devices).	cribe radioisotopes and quantities used: 35.100, 35.200, 35.300 s, 35.600 gamma stereotactic radiosurgery units, emerging techn	, 35.400, 35.500, iologies (provide

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C FORM 313A (RSO)		U.S. NUCLEAR REGULATORY COMMISS
RADIATION SAFETY OFFICER TRA	VING AND EXPERIENCE A	ND PRECEPTOR ATTESTATION (continued)
3. Structured Educational Program fo	r Proposed Radiation Safet	v Officer (continued)
 c. Training in radiation safety, regula license (continued) 	ory issues, and emergency p	procedures for all types of medical use on the
Supervising Individual If training was pro RSO, AU, AMP, or ANP. (If more than one su) necessary to document supervised training, pr (this page.)	ervising individual is vide multiple copies of	ermit Number listing supervising individual
JULIA (SHAN) MARLATT	z 2,	1-05432-04
License/Permit lists supervising indiv	dual as:	
Radiation Safety Officer	Authorized User	uthorized Nuclear Pharmacist
Authorized Medical Physicist		
Authorized as RSO, AU, ANP, or	MP for the following medical	luses:
35.100 35.200	35.300 35	i.400
35.500 35.600 (remo	e afterloader) 35	5.600 (teletherapy)
35.600 (gamma stereotactic ra	diosurgery) 35	5.1000 ()
d. Skip to and complete Part II Prece	ntor Attactation	
o. Only to and complete Part in Field	OR	
a. Provide license number.b. Use the table in section 3.c. to	lescribe training in radiation :	safety, regulatory issues, and emergency
procedures for all types of med c. Skip to and complete Part II Pr		
	RT II - PRECEPTOR ATTE	STATION
te: This part must be completed by the individual as long as the preceptor one preceptor is necessary to doc	individual's preceptor. The provides, directs, or verifies t	preceptor does not have to be the supervising training and experience required. If more than eparate preceptor statement from each.
st Section eck one of the following:		
1. Board Certification	,	
I attest that	has satisfad	ctorily completed the requirements in
Name of Proposed Red		•
10 CFR 35.50(a)(1)(i) and (a)(1)(ii	; or 35.50 (a)(2)(i) and (a)(2)((il); or 35.50(c)(1).
	OR	
2. Structured Educational Program		etv Officers
I attest that		torily completed a structural educational
Name of Proposed Rad	tion Safety Officer	
		bry training and one year of full-time
radiation safety experience as requ	ared by 10 CFR 35.50(D)(1).	

NRC FORM 313A (R	BO) U.S. NUCLEAR REGULATORY COMMISSION		
	(3-2009) RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)		
Preceptor Attesta	tion (continued)		
First Section (cor Check one of the			
び 3. Addition	al Authorization as Radiation Safety Officer		
I attest that	It <u>Todd</u> Bospulck is an Name of Proposed Radiation Safety Officer		
L'Aut	horized User		
Aut	horized Medical Physicist		
Identified on the Licensees license and has experience with the radiation safety aspects of similar type of use of byproduct material for which the individual has Radiation Safety Officer responsibilities			
	AND		
Second Section	check all that apply):		
Tattest that	Name of Proposed Radiation Safety Officer has training in the radiation safety, regulatory issues, and		
	ocedures for the following types of use:		
35.100			
☑ 35.200			
35.300	oral administration of less than or equal to 33 millicuries of sodium iodide I-131, for which a written directive is required		
35.300	oral administration of greater than 33 millicuries of sodium iodide I-131		
5 35.300	parenteral administration of any beta-emitter, or a photon-emitting radionuclide with a photon energy less than 150 keV for which a written directive is required		
54 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 radiosurgery units		
35.1000	emerging technologies, including:		
ale 1 de contra de la contra de l			
	PAGE 5		

NRC FORM 313A (RSO) (3-2009)	U.S. NUCLEAR REGULATORY COMMISSION
.	TY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)
	AND
Third Section Complete for ALL	
I attest that	Trace Bos Rectelence has achieved a level of radiation safety knowledge
sufficient to functi	ion independently as a Radiation Safety Officer for a medical use licensee.
Fourth Section Complete the following	ng for Preceptor Attestation and signature
I am the Radiation S	afety Officer for Marguette Jeneral Health System
License/Permit Number	21-05432-04
	·
Name of Preceptor Julia (Shan) N	Marlette Julia Shan Marlett 906-225-6967 1-12-12



2309 Shelby Avenue Ann Arbor, MI 48103 www.mpcphysics.com

Shan Marlette, M.S. Radiologic Health Physicist

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Dennis U'ROND

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DATE

TO

FROM

SUBJECT/COMMENTS

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BELL RADIOLOGY PHONE #485-2632