



Beebe
Medical
Center

INSIST ON QUALITY

June 4, 2013

USNRC Region I DNMS
2100 Renaissance Boulevard
King of Prussia, PA 19406

B. 1
03013331

REC RG 1 06 26 13 AM 07 10

RE: License No. 07-17792-01
Amendment Request Pursuant to 35.14(b)(5)
Change in Radiation Safety Officer

Dear Sir or Madame:

Beebe Medical Center would like to amend the above referenced license to designate a change in Radiation Safety Officer. Effective July 1, 2013, Mr. Malek Daneshvarnezhad of Krueger-Gilbert Health Physics, Inc. will assume the duties and responsibilities of Radiation Safety Officer (RSO). Mr. Daneshvarnezhad's training and experience meet the requirements set forth in Section 35.50 of 10 CFR.

Mr. Daneshvarnezhad is certified by the American Board of Health Physics and the American Board of Radiology. He has 20 years experience in radiation safety and has served as temporary RSO for our institution on several occasions.

Krueger-Gilbert Health Physics, Inc has been retained to oversee our materials program as well as radiation machine usage. The agreement has been structured so as to assure sufficient time and attention is given to the day to day operations of our radiation safety program as well as the more broad aspects.

Enclosed please find documentation of Mr. Daneshvarnezhad's qualifications and a summary of the agreement with Krueger-Gilbert Health Physics, Inc. as it relates to this important role.

If additional information is needed or there are any questions regarding our request, please contact either, Mr. Daneshvarnezhad directly at (410) 692-9806 or our Director of Diagnostic Imaging, Mr. Dan Mapes at 302-645-3342.

Sincerely,


Jeffrey M. Fried, FACHE
President and CEO

581266
NMSS/RGN1 MATERIALS-002



INSIST ON QUALITY

MEMORANDUM

TO: Malek Daneshvarnezhad, DABR DATE: Effective July 1, 2013
Radiation Safety Officer

FROM: Jeffrey M. Fried, FACHE SUBJECT: Delegation of Authority
Chief Executive Officer

You, Malek Daneshvarnezhad, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the radiation safety program; identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities, and ensuring compliance with regulations.


You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of radioactive material by employees who do not meet the necessary requirements and shutting down operations where justified by radiation safety. You are required to notify management of situations where staff are not cooperating and not addressing radiation safety issues.

In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time.



Jeffrey M. Fried, FACHE
President and Chief Executive Officer

I accept the above responsibilities.



Malek Daneshvarnezhad, DABR
Radiation Safety Officer

Reference: NUREG-1556, Vol. 9, Rev. 2; January 2008

AGREEMENT SUMMARY AS IT PERTAINS TO RADIATION SAFETY OFFICER

Routine Time Commitment:

Either the Radiation Safety Officer (RSO) or their assistant will be on site no less than one day per week (on average). Should more time be needed to fulfill the responsibilities of RSO, contract provisions have been made to approve additional time. In addition to on site time, the RSO is expected to devote an estimated 6-8 hours each month off site.

In addition to the RSO's periodic audits, a second KGHP physicist will perform quarterly radiation protection surveys in the Nuclear Medicine Department, Brachytherapy, and PET Imaging Centers. The surveys are intended to assure conformance with the current NRC license requirements. The surveys will include testing for removable contamination, radiation level measurements in areas of typical exposure, review of staff-conducted surveys and other pertinent records.

Availability

The Radiation Safety Officer is available to Beebe Medical Center 24 hours per day, 7 days per week via cellular phone. Contact information will be readily available to the technical staff should there be questions or incident involving radiation. KGHP, Inc. employs eleven (11) physicists and a full time administrative staff to support the RSO and assist Beebe Medical Center.

In the event of an emergency, the RSO can be physically on site within 3 – 3.5 hours.

KGHP will provide a back up RSO to cover radiation related issues should the RSO be unavailable by phone or email (e.g. vacation, medical leave, etc). Contact information for the individual will be disseminated to appropriate departments

Communication

In addition to the established quarterly meetings of the Radiation Safety Committee, regular briefings will be held between the RSO and hospital management. These briefings will serve to keep management informed on program status and provide a forum in which the RSO may outlined any needs, including expenditure of funds, to facility the objectives of the Center's radiation safety and ALARA programs.

KRUEGER-GILBERT HEALTH PHYSICS, INC.
DUTIES AND RESPONSIBILITIES AS RADIATION SAFETY OFFICER

The RSO's duties and responsibilities include ensuring radiological safety and compliance with the Nuclear Regulatory Commission (NRC), State of Delaware, DOT regulations, and the conditions of the facility's X-ray Registration & Radioactive Materials Licenses.

The RSO duties and responsibilities include ensuring the following:

- Unsafe activities involving licensed material are stopped;
- Radiation exposures are ALARA;
- Up-to-date radiation protection procedures in the daily operation of the licensee's radioactive material program are developed, distributed, and implemented;
- Possession, use, and storage of licensed material is consistent with the limitations in the license, the regulations, the SSDR certificate(s), and the manufacturer's recommendations and instructions;
- Personnel training is conducted yearly and is commensurate with the individual's duties regarding licensed material;
- Documentation is maintained to demonstrate that individuals are not likely to receive, in 1 year, a radiation dose in excess of 10% of the allowable limits or that personnel monitoring devices are provided;
- When necessary, personnel monitoring devices are used and exchanged at the proper intervals, and records of the results of such monitoring are maintained;
- Licensed material is properly secured;
- Documentation is maintained to demonstrate, by measurement or calculation, that the total effective dose equivalent to the individual likely to receive the highest dose from the licensed operation does not exceed the annual limit for members of the public;
- Proper authorities are notified of incidents such as loss or theft of licensed material, damage to or malfunction of sealed sources, and fire;
- Medical events and precursor events are investigated and reported to the NRC and/or State of Delaware, cause(s) and appropriate corrective action(s) are identified, and timely corrective action(s) are taken;
- Comprehensive audit of the radiation protection program are performed at least annually and documented;
- If violations of regulations, license conditions, or program weaknesses are identified, effective corrective actions are developed, implemented, and documented;
- Licensed material is transported, or offered for transport, in accordance with all applicable DOT requirements;
- Licensed material is disposed of properly;
- Appropriate records are maintained; and
- An up-to-date license is maintained and amendment and renewal requests are submitted in a timely manner.

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE
AND PRECEPTOR ATTESTATION**
[10 CFR 35.50]

APPROVED BY OMB: NO. 3150-0120
EXPIRES: (05/31/2015)

Name of Proposed Radiation Safety Officer

Malek Daneshvarmezhad, MS, CHP, DABR

Requested Authorization(s) *The license authorizes the following medical uses (check all that apply):*

- 35.100
 35.200
 35.300
 35.400
 35.500
 35.600 (remote afterloader)
 35.600 (teletherapy)
 35.600 (gamma stereotactic radiosurgery)
 35.1000 (_____)

PART I -- TRAINING AND EXPERIENCE
(Select one of the four methods below)

*Training and Experience, including board certification, must have been obtained within the 7 years preceding the date of application or the individual must have obtained related continuing education and experience since the required training and experience was completed. Provide dates, duration, and description of continuing education and experience related to the uses checked above.

1. Board Certification

- a. Provide a copy of the board certification.
- b. Use Table 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.

OR

2. Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Uses Checked Above

- a. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for the additional types of medical use for which recognition as RSO is sought.
- b. Skip to and complete Part II Preceptor Attestation.

OR

3. Structured Educational Program for Proposed Radiation Safety Officer

a. Classroom and Laboratory Training

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.)+ <div style="border: 1px solid black; height: 40px; width: 100%; margin-top: 5px;"></div>		

+ 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).

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 (continued)

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

Supervising Individual	License/Permit Number listing supervising individual as a Radiation Safety Officer
This license authorizes the following medical uses: <input type="checkbox"/> 35.100 <input type="checkbox"/> 35.200 <input type="checkbox"/> 35.300 <input type="checkbox"/> 35.400 <input type="checkbox"/> 35.500 <input type="checkbox"/> 35.600 (remote afterloader) <input type="checkbox"/> 35.600 (teletherapy) <input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery) <input type="checkbox"/> 35.1000 (_____)	

c. Describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.

Description of Training	Training Provided By	Dates of Training*
Radiation safety, regulatory issues, and emergency procedures for 35.100, 35.200, and 35.500 uses	Victoria Morris, MS, CHP Suzanne Krueger-Schmidt, MS, DABSNM	1993-2000 prior to 2008 to present
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	Victoria Morris, MS, CHP Suzanne Krueger-Schmidt, MS, DABSNM	1993-2000 prior to 2008 to present
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	Victoria Morris, MS, CHP Suzanne Krueger-Schmidt, MS, DABSNM	1993-2000 prior to 2008 to present
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses	Victoria Morris, MS, CHP Suzanne Krueger-Schmidt, MS, DABSNM	1993-2000 prior to 2008 to present
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses	Victoria Morris, MS, CHP Suzanne Krueger-Schmidt, MS, DABSNM	1993-2000 prior to 2008 to present
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses	Victoria Morris, MS, CHP Suzanne Krueger-Schmidt, MS, DABSNM	1993-2000 prior to 2008 to present
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):	Victoria Morris, MS, CHP Suzanne Krueger-Schmidt, MS, DABSNM	1993-2000 prior to 2008 to present

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)

<p>Supervising Individual <i>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.)</i></p> <p>Suzanne Krueger-Schmidt, MS, DABSNM</p>	<p>License/Permit Number listing supervising individual</p> <p>MD License #25-058-01 and NRC License # 07-17792-01</p>
<p>License/Permit lists supervising individual as:</p> <p><input checked="" type="checkbox"/> Radiation Safety Officer <input type="checkbox"/> Authorized User <input type="checkbox"/> Authorized Nuclear Pharmacist</p> <p><input type="checkbox"/> Authorized Medical Physicist</p> <p>Authorized as RSO, AU, ANP, or AMP for the following medical uses:</p> <p><input checked="" type="checkbox"/> 35.100 <input checked="" type="checkbox"/> 35.200 <input checked="" type="checkbox"/> 35.300 <input checked="" type="checkbox"/> 35.400</p> <p><input checked="" type="checkbox"/> 35.500 <input type="checkbox"/> 35.600 (remote afterloader) <input type="checkbox"/> 35.600 (teletherapy)</p> <p><input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery) <input type="checkbox"/> 35.1000 (_____)</p>	

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 Malek Daneshvarnezhad 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

I attest that _____ has satisfactorily completed a structural educational

Name of Proposed Radiation Safety Officer

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

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

Preceptor Attestation (continued)

First Section (continued)

Check one of the following:

3. Additional Authorization as Radiation Safety Officer

I attest that _____ is an
Name of Proposed Radiation Safety Officer

Authorized User

Authorized Nuclear Pharmacist

Authorized 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

Complete for all (*check all that apply*):

I attest that Malek Daneshvarnezhad has training in the radiation safety, regulatory issues, and
Name of Proposed Radiation Safety Officer

emergency procedures 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

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

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:

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

AND

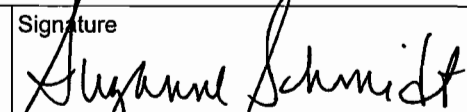
Third Section
Complete for ALL

I attest that Malck Daneshvarnezhad has achieved a level of radiation safety knowledge
Name of Proposed Radiation Safety Officer
sufficient to function independently as a Radiation Safety Officer for a medical use licensee.

Fourth Section
Complete the following for Preceptor Attestation and signature

I am the Radiation Safety Officer for Beebe Medical Center
Name of Facility

License/Permit Number: NRC License No. 07-17792-01

Name of Preceptor	Signature	Telephone Number	Date
Suzanne Krueger Schmidt, MS, DABSNM		4106929806	1/1/2012

American Board of Health Physics

Be it known that

Malek M. Daneshvarnezhad

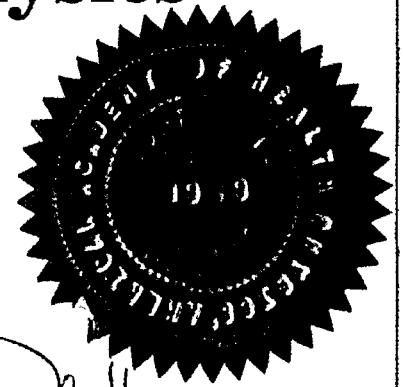
has satisfactorily met the professional standards established by the


American Board of Health Physics

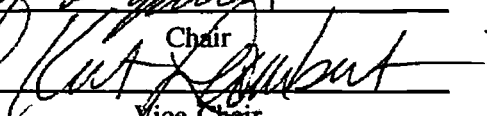
*and is hereby certified in
the comprehensive practice of*

HEALTH PHYSICS

*and is entitled to be identified as a Diplomate
of the American Board of Health Physics*



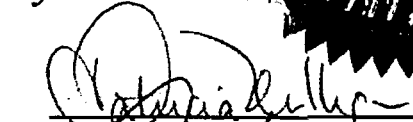


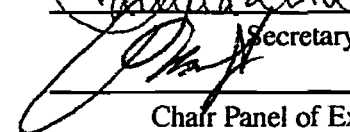
Chair


Vice-Chair

November 2008

Date



Secretary


Chair Panel of Examiners



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Boston, Massachusetts

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Charleston, South Carolina
Geoffrey S. Ibbott, Ph.D.
Houston, Texas
Richard L. Morin, Ph.D.
Jacksonville, Florida

November 22, 2011

Malek Mansour Daneshvarnezhad, MS

PD Certificate in Diagnostic Medical Physics

Dear Mr. Daneshvarnezhad,

I am pleased to inform you that you passed the oral examination held on November 6 - 7, 2011. The American Board of Radiology grants you a Certificate in Diagnostic Medical Physics. This is a ten-year time-limited certificate that is valid through December 31, 2021.

In addition, you have satisfied the NRC training requirements enabling you to be recognized as an ABR Diplomate in Diagnostic Medical Physics who is eligible to become a Radiation Safety Officer (RSO) via the certification pathway in 10 CFR 35.50(a)(2). Thus, you will receive the "RSO-Eligible" designation on your certificate.

Our printer will send your certificate to the above address in approximately three months. Your name will appear on the certificate as shown above. If you have an address change, you may update your address in your personal database (PDB). Legal name changes cannot be made on the PDB as they require supporting documentation. If you wish to have your name displayed differently on your certificate, please submit a name change request in writing to the ABR office by December 22, 2011. Your name and demographic information also will be included in a directory published by the American Board of Medical Specialties. It is your responsibility to notify other local, state, or national organizations of your certification.

Important information about your Maintenance of Certification process is enclosed. Please review it and respond as requested.

Personally, and on behalf of the Board of Trustees of the American Board of Radiology, I wish to congratulate you for this distinguished achievement.

Sincerely,

Gary J. Becker, MD
Executive Director

PERSONAL INFORMATION WAS REMOVED
BY NRC. NO COPY OF THIS INFORMATION
WAS RETAINED BY THE NRC.

Gary J. Becker, M.D., Executive Director

Assistant Executive Directors: Primary Certification
Diagnostic Radiology: Dennis M. Balfe, M.D.
Radiation Oncology: Dennis C. Shreve, M.D., Ph.D.
Medical Physics: Richard L. Morin, Ph.D.
Subspecialties: Milton J. Gubertau, M.D.

Associate Executive Directors
Diagnostic Radiology: Kay H. Vydareny, M.D.
Radiation Oncology: Paul E. Wolner, D.O.
Medical Physics: Stephen R. Thomas, Ph.D.
Administration: Jennifer L. Bosma, Ph.D.

Assistant Executive Directors: Maintenance of Certification
Diagnostic Radiology: James P. Borgstede, M.D.
Radiation Oncology: Anthony L. Zelman, M.D.
Medical Physics: G. Donald Frey, Ph.D.
Subspecialties: Milton J. Gubertau, M.D.

The American Board of Radiology

*Organized through the cooperation of the
American College of Radiology, the American Roentgen Ray Society,
the American Radium Society, the Radiological Society of North America,
the Section on Radiology of the American Medical Association,
the American Society for Radiation Oncology, the Association of
University Radiologists, and the American Association of Physicians in Medicine
Hereby certifies that*

Malek Mansour Daneshvarnezhad, MS

*Has pursued an accepted course of graduate study and clinical work; has met certain standards
and qualifications, including passing the examinations conducted under the authority of
The American Board of Radiology, demonstrating to the satisfaction of the Board qualification
to practice; and is therefore awarded the Board's certification in the specialty of*

Diagnostic Medical Physics

RSO Eligible

November 07, 2011

ABR



*This diplomate of the American Board of Radiology
is now permitted to use the ABR mark to signify this certification.*



Certificate No. H5292

Eric J. Henry
President

Richard L. Morin
Secretary-Treasurer

Hayden B. ...
Executive Director

Valid through 2021

This is to acknowledge the receipt of your letter/application dated

06-04-13, and to inform you that the initial processing which includes an administrative review has been performed.

Amend: 07-17792-01 (2)
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

⁽²⁾
Your action has been assigned **Mail Control Number** 581266
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI)
(6-96)

Sincerely,
Licensing Assistance Team Leader