



SAINT LUKE'S HEALTH SYSTEM

saintlukeshealthsystem.org

December 1, 2004

Materials Licensing Section
U.S. Nuclear Regulatory Commission, Region III
2443 Warrensville Road, Ste 210
Lisle, IL 60532-4352
Attn: Patricia Pelke

Re: License Amendment Application for License No. 24-00889-01

Saint Luke's Hospital of Kansas City (SLH) is requesting that your office amend its Type A License of Broad Scope to incorporate affiliated hospitals within the Saint Luke's Health System (SLHS). Specifically, we would like to incorporate Saint Luke's Northland Hospital (SLN), License # 24-18631-02. In an attempt to standardize and provide better radiation safety services across the Saint Luke's Healthcare System, we intend to systemize policies, procedures and services under a System Radiation Safety Officer. Enclosed please find NRC Form 313, and supplemental attachments that will provide specific information regarding this program. Saint Luke's administration continues to provide its strongest backing to fulfill its materials license commitments. If you have any questions regarding this application, please contact Greg Sackett at (816) 932-6296.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Mark McPhee", followed by a horizontal line.

Mark McPhee, M.D.
Chief Operating Officer

Enc: NRC Form 313
Supplemental Information to NRC Form 313

DEC 07 2004

NRC FORM 313
(4-2004)
10 CFR 30, 32, 33,
34, 35, 36, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR MATERIAL LICENSE

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 10/31/2005

Estimated burden per response to comply with this mandatory collection request: 7 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NE0B-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, MISSISSIPPI, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-4005

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

☐

A. NEW LICENSE

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B. AMENDMENT TO LICENSE NUMBER 24-00889-01

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C. RENEWAL OF LICENSE NUMBER

2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)

Saint Luke's Hospital of Kansas City
4401 Wornall Road
Kansas City, MO 64111

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

Saint Luke's Hospital of Kansas City
4401 Wornall Road
Kansas City, MO 64111

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Greg Sackett, CHP

TELEPHONE NUMBER

(816) 932-6296

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY

AMOUNT
ENCLOSED \$

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 82 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Steven J. Bollin Sr. Director Radiology

SIGNATURE

[Signature]

DATE

12-01-04

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

The supplemental information provided is intended to be consistent in format and content with Appendix C of NUREG-1556, Vol. 11.

NRC Form 313 Item 3, Additional addresses where byproduct material is currently used

1. Medical Plaza III Building; 4321 Washington, Suite 1100; Kansas City, MO 64111
2. Saint Luke's Northland Hospital, 5830 N.W. Barry Road; Kansas City, MO 64154

The following locations should be removed from the license, as research activities involving radioactive materials have ceased and the facilities decommissioned:

1. Dickson-Diveley Laboratory, 4312 J.C. Nichols Parkway, Kansas City, Missouri
2. Medical Plaza I Building, 4320 Wornall Road, Kansas City, Missouri

NRC Form 313 Item 5, Radioactive Material

No change from current license.

Incorporate licensed materials use under Saint Luke's Northland Hospital license (24-18631-02), issued in accordance with letter dated November 11, 2003.

NRC Form 313 Item 6, Purpose for which licensed material will be used

Specifically add [REDACTED], in sealed source form, [REDACTED]
(from Northland License).

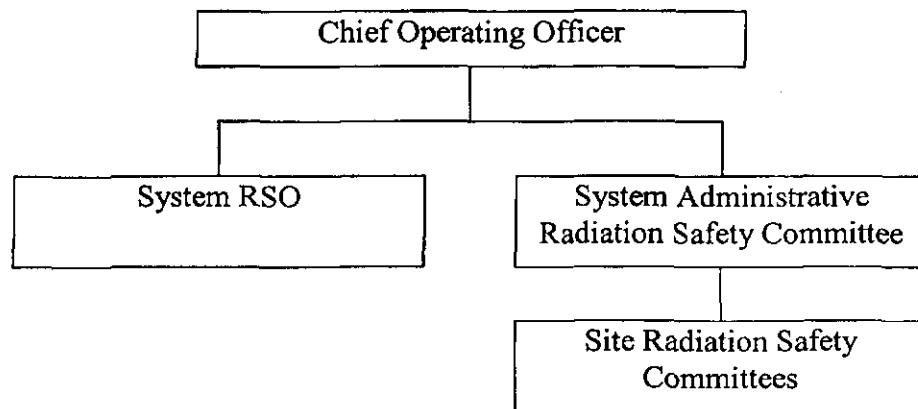
Note that I-131 treatment of thyroid carcinoma will only at SLH, and not at SLN.

NRC Form 313 Item 7, Individuals Responsible for Radiation Safety Program and their Training Experience

Executive Management

SLH is committed to ensure a safe work place for its associates, including fulfilling State and Federal requirements and meeting all Joint Commission on Accreditation of Healthcare Organization specifications. Executive management has empowered a System Radiation Safety Committee (RSC) and System Radiation Safety Officer (RSO) to effectively implement the SLHS Radiation Safety Program. Delegations of Authority to the RSO have been provided by all executive management from Northland Hospital. The System RSC is intended to be an

administrative oversight committee that will focus on consistency of policies, procedures, training and other areas of radiation safety that will apply across the System.



Radiation Safety Committees

SLHS will meet or exceed the requirements specified within 10 CFR 35.22 and 35.23 concerning membership of the site-specific RSCs. Site-specific Radiation Safety Committees currently in existence will continue to provide oversight and make radiation safety decisions for their specific institutions. Membership on the Site-specific committees will continue to be as required by regulation, with the addition of the System RSO or representative replacing current site RSOs.

Radiation Safety Officer

The RSO for this license will be Greg Sackett, CHP. Mr. Sackett is a Certified Health Physicist [fulfilling 10 CFR 35.900(a) requirements] who also meets the training and experience requirements specified in 10 CFR 35.900(b). Mr. Sackett has been an RSO on a broad scope medical/academic license for over 4 years, and the RSO of SLH Type A License of Broad Scope license since May 2004.

Assistant Radiation Safety Officer

In order to support the increased workload and radiation safety responsibility for additional sites, SLHS has created the position of Assistant RSO. This position will support the activities of the radiation safety program, as well as represent the RSO when they are unavailable. The position has been created and SLHS has hired Mr. Roy Sions, CHMM to fill this position. Mr. Sions has several years of experience supporting a broad scope medical/academic license and meets the training and experience requirements specified in 10 CFR 35.900(b). His resume is attached.

Authorized Users

Authorized Users currently listed on Saint Luke's Northland Hospital license (24-18631-02) shall be incorporated into a system-wide database of approved authorized users that will track

authorized locations, materials and uses within the system. Authorized users will be approved by location by site-specific RSC.

NRC Form 313 Item 8, Training for Individuals Working in or Frequenting Restricted Areas

No change from current license.

NRC Form 313 Item 9, Facilities and Equipment

Amend to incorporate facilities and equipment (Item 9) listed in Saint Luke's Northland Hospital (License # 24-18631-02) Renewal Application dated May 15, 2001.

NRC Form 313 Item 10, Radiation Safety Program

All System facilities operating under the broad scope license will follow the system radiation safety program, as provided in the Saint Luke's Hospital Radiation Safety Manual.

Regarding emergency response for various facilities under this license. Radiation Safety personnel are on-call for all facilities at any hour of the day, via wireless media (pager/cell phone). The primary location for radiation safety staff is Saint Luke's Hospital (Midtown). This location is approximately 30 minutes away from the Northland campus. On-site personnel are trained to deal with an emergency until Radiation Safety personnel can arrive.

NRC Form 313 Item 11, Waste Management

Radioactive waste will be stored and secured in site-specific locations, and monitored by Radiation Safety staff. SLHS will meet the requirements specified in 10 CFR 20 Subpart K.