

20 March 2006

Sandra Gabriel
Senior Health Physicist
U.S. Nuclear Regulatory Commission
Region I Medical Branch
475 Allendale Road
King of Prussia, PA 19406-1415

Dear Ms. Gabriel,

This letter will serve as our response to your letter of inquiry dated 15 March 2006 regarding our recent materials license application. (**Control #138341; Docket #03037131**) Our responses will follow your numbers as written.

1. The control over the radiation safety program will be delegated to Mr. Nunn as described in the model "Delegation of Authority" as published in NUREG 1556 Volume 9, revision 1. (Please see attached) The Radiation Safety Officer (RSO) will be granted sufficient authority, at the executive level, over the authorized users such that he may address any radiation safety issues that come before him. We do not anticipate any large issues, as this is only a diagnostic nuclear medicine installation.
2. The administration of Summersville Memorial Hospital (SMH) does hereby grant Mr. Nunn whatever fiscal access may be necessary in the performance of his duties.
3. Mr. Nunn is a full-time Physics consultant and as such travels to many hospitals in our area. Currently Mr. Nunn is obligated to perform the duties of RSO at one other cardiology clinic. We know of no other "firm" obligations of Mr. Nunn's time that would preclude him performing duties as RSO for SMH. At present SMH and Physics Associates (Mr. Nunn's primary employer) are entering into a contractual agreement for him to provide these services at minimum of 1 day per month (8-10 hours). Also, the contract will include special provisions for Mr. Nunn's time as needed. Furthermore, Physics Associates is an established Health/Medical Physics consulting firm that has provided service to SMH for many years in our radiology department. We have never, and do not anticipate, any issues in the performance of their duties.

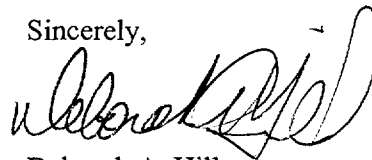
Summersville Memorial Hospital Request for Additional Information
Materials Application Docket #03037131 Control #138341
20 March 2006 Rev. 1

138341
NRC/RCN MATERIALS-002

4. The in-house representative for Mr. Nunn is Halberto G. Cruz, MD, who is our primary radiologist and authorized user for the materials as described in our application. Dr. Cruz has heartily agreed to assist Mr. Nunn in whatever capacity he requires.
5. As described above Physics Associates/Mr. Nunn have never had a problem in responding to matters that require urgent attention. (e.g. MQSA, X-ray. Et cetera) Mr. Nunn is available for call 24-hours a day, his office is available and staffed Monday through Friday from 0830 to 1630, 52 weeks per year. Mr. Nunn's residence is 2-hours from our facility and his back up is three hours from our facility. In the event of an emergency, Physics Associates has air transport and can be at the airport at Summersville in approximately 1-hour.
6. Please see the attached floor plan for details.
 - a. We will store radiopharmaceuticals in the shipping containers from the pharmacy. (lead batons and "ammo can")
 - b. Radioactive waste will be stored in leaded waste containers (sharps bins) that have been purchased from Biodex, Inc. Also, we are constructing a 1/8" lead lined cabinet for storage of radioactive waste under the counter top.
 - c. Please see the diagram for location of dispensing area.
7. Our radiation detection instruments are as follows;
 - a. 2 Ludlum 14C GM survey meters with model 44-9 (Pancake style) probes.
 - b. 1 Capintec CRC-15W ion chamber dose calibrator and NaI(Tl) wipe counter. The wipe counter is sensitive enough to meet the minimum detectable activity limits for contamination surveys and DOT package check-in.

We hope these responses have answered your questions adequately to proceed with the processing of our materials license. Should you require any additional information, please do not hesitate to contact Mr. Nunn or myself.

Sincerely,



Deborah A. Hill
Chief Executive Officer
Summersville Memorial Hospital

Duties and Responsibilities of the Radiation Safety Officer and Delegation of Authority

RSO's Duties and Responsibilities

The RSO's duties and responsibilities include ensuring radiological safety and compliance with NRC and DOT regulations and the conditions of the license. Model procedures for describing the RSO's duties and responsibilities appear below. Applicants may either adopt these model procedures or develop alternative procedures to meet the requirements of 10 CFR 35.24.

These duties and responsibilities include ensuring the following:

- Stopping unsafe activities involving licensed material;
- Radiation exposures are ALARA;
- Up-to-date radiation protection procedures in the daily operation of the licensee's byproduct 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;
- Individuals installing, relocating, maintaining, adjusting, or repairing devices containing sealed sources are trained and authorized by an NRC or Agreement State license;
- Personnel training is conducted and is commensurate with the individual's duties regarding licensed material;
- Documentation is maintained to demonstrate that individuals are not likely to receive, in one 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 NRC, and cause(s) and appropriate corrective action(s) are identified, and timely corrective action(s) are taken;

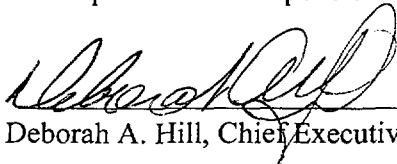
- Audits of the radiation protection program are performed at least annually and documented;
- If violations of regulations, license conditions, or program weaknesses are identified, effective corrective actions are developed, implemented, and documented;
- Licensed material is transported, or offered 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.

Delegation of Authority

Memo To: James P. Nunn, MS Radiation Safety Officer
 From: Deborah A. Hill, Chief Executive Officer
 Subject: Delegation of Authority

You, James P. Nunn, MS, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the radiation protection program; identifying radiation protection 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 byproduct 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 if staff do not cooperate and do not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time. It is estimated that you will spend 8-10 hours per month conducting radiation protection activities.

I accept the above responsibilities,

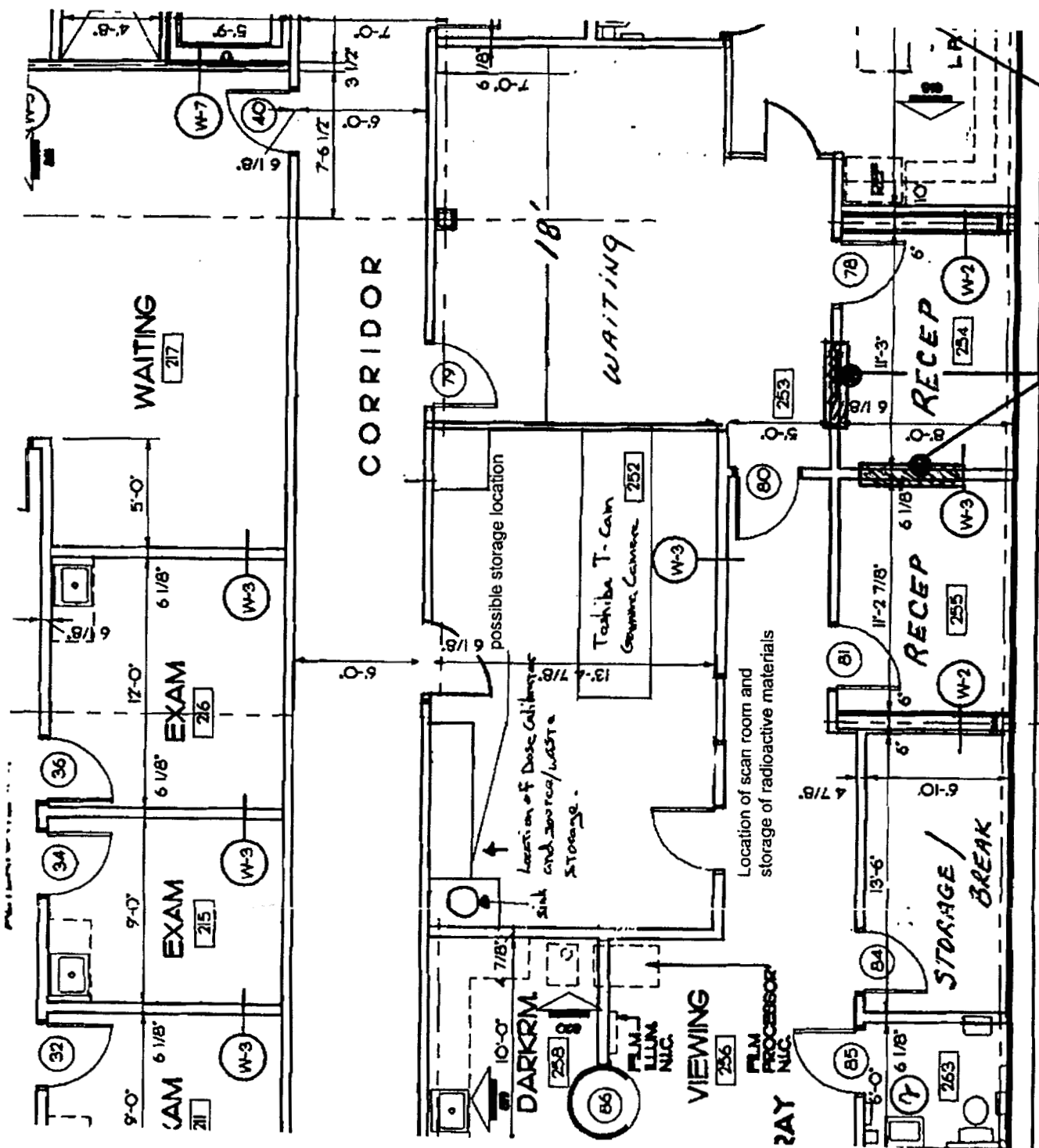

 Deborah A. Hill, Chief Executive Officer

 James P. Nunn, MS

3/21/06
 Date

 Date

cc: Affected department heads



Summersville Memorial Hospital Floor Plans: Layout of 2nd Floor showing Nuclear Medicine Layout

To basement exit

Corridor

Corridor

Summersville Memorial Hospital Floor Plan Layout Hot Lab and Scan Room

