



## TELECOPY TRANSMITTAL

DATE: 8/13/07TO: James MullauerFax Number: 630-829-9873FROM: Kevin Miller

RE: \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

This transmittal consists of 9 pages (including transmittal cover sheet). Please contact me if you have any questions or problems with this transmittal.

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Ann Arbor, MI 48103  
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1780 E. Logan Avenue  
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NORTHWEST  
CARDIOLOGY, P.C.

NATHAN KERNER, M.D., FACC

26400 W. Twelve Mile Rd.  
Suite 120  
Southfield, MI 48034

phone: 248-304-3200  
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RSO/EXECUTIVE MANAGEMENT  
LETTER OF UNDERSTANDING

June 18, 2007

Kevin B. Miller, B.S.  
Radiation Safety Officer

RE: Radiation Safety Officer / Executive Management Letter of Understanding

Dear Mr. Miller:

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 selection 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.

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,

Executive Management

Radiation Safety Officer



NORTHWEST  
CARDIOLOGY, P.C.

NATHAN KERNER, M.D., FACC

26400 W. Twelve Mile Rd.  
Suite 120  
Southfield, MI 48034

phone: 248-304-3200  
fax: 248-208-9907

August 1, 2007

United States Nuclear Regulatory Commission  
Region III, Materials Licensing  
2443 Warrendale Road Suite 210  
Lisle, IL 60532-4352

RE: Amendment to NRC License No. 21-32616-01

Dear Sir/Madam:

Kevin B. Miller is currently not a Radiation Safety Officer on any other NRC license.

If you have any questions or require additional information, please contact our  
physics consultant, Kevin B. Miller, Medical Physics Consultants at 734-662-3197

Sincerely,

Nathan Kerner, M.D.  
Executive Management

Kevin B. Miller, B.S.  
Radiation Safety Officer

<b>NRC FORM 313A (RSO)</b> (10-2006)	<b>U.S. NUCLEAR REGULATORY COMMISSION</b>	APPROVED BY OMB: NO. 3150-0120 EXPIRES: 10/31/2008	
<b>RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION</b> <b>[10 CFR 35.50]</b>			
Name of Proposed Radiation Safety Officer <b>Kevin B. Miller</b>			
Requested Authorization(s) <i>The license authorizes the following medical uses (check all that apply):</i> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.100</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.200</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.300</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.400</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.500</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.600 (remote afterloader)</div> <div style="width: 33%;"><input type="checkbox"/> 35.600 (teletherapy)</div> <div style="width: 33%;"><input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)</div> <div style="width: 33%;"><input type="checkbox"/> 35.1000 ( _____ )</div> </div>			
<b>PART I -- TRAINING AND EXPERIENCE</b> <i>(Select one of the four methods below)</i>			
*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.			
<input type="checkbox"/> <b>1. Board Certification</b> 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.			
<b>OR</b>			
<input type="checkbox"/> <b>2. Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Uses Checked Above</b> 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.			
<b>OR</b>			
<input checked="" type="checkbox"/> <b>3. Structured Educational Program for Proposed Radiation Safety Officer</b> a. Classroom and Laboratory Training			
Description of Training	Location of Training	Clock Hours	Dates of Training*
Radiation physics and instrumentation	Ferris State College Big Rapids, MI Nuclear Med Radiation Physics Course Medical Physics Consultants	50	09/83 to 06/84
		3	03/04
		100	05/00 to 05/07 <input checked="" type="checkbox"/>
Radiation protection	Ferris State College Big Rapids, MI Nuclear Med Radiation Physics Course Medical Physics Consultants	50	09/83 to 06/84
		3	03/04
		100	<input checked="" type="checkbox"/> 05/00 to 05/07
Mathematics pertaining to the use and measurement of radioactivity	Ferris State College Big Rapids, MI Nuclear Med Radiation Physics Course Medical Physics Consultants	50	09/83 to 06/84
		2	03/04
		100	05/00 to 05/07
Chemistry of byproduct material for medical use	Ferris State College Big Rapids, MI Nuclear Med Radiation Physics Course Medical Physics Consultants	25	09/83 to 06/84
		3	03/04
		100	05/00 to 05/07
Radiation biology	Ferris State College Big Rapids, MI Nuclear Med Radiation Physics Course Medical Physics Consultants	20	09/83 to 06/84
		2	03/04
		100	05/00 to 05/07
<b>Total Hours of Training:</b>		<b>708</b>	

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(10-2006)

**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	St. John Macomb Hospital NRC License 21-01190-05	06/05 to present
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides	St. John Macomb Hospital NRC License 21-01190-05	06/05 to present
Securing and controlling byproduct material	St. John Macomb Hospital NRC License 21-01190-05	06/05 to present
Using administrative controls to avoid mistakes in administration of byproduct material	St. John Macomb Hospital NRC License 21-01190-05	06/05 to present
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures	St. John Macomb Hospital NRC License 21-01190-05	06/05 to present
Using emergency procedures to control byproduct material	St. John Macomb Hospital NRC License 21-01190-05	06/05 to present
Disposing of byproduct material	St. John Macomb Hospital NRC License 21-01190-05	06/05 to present
Licensed Material Used (e.g., 35.100, 35.200, etc.) + 35.100, 35.200, 35.300, 35.400, 35.500, 35.600	St. John Macomb Hospital NRC License 21-01190-05	06/05 to present

\* 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, emergin; technologies (provide list of devices).

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**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 <b>James M. Botti, M.S.</b>	License/Permit Number listing supervising individual as a Radiation Safety Officer <b>21-01190-05</b>
This license authorizes the following medical uses:	
<input checked="" type="checkbox"/> 35.100 <input checked="" type="checkbox"/> 35.200 <input checked="" type="checkbox"/> 35.300 <input checked="" type="checkbox"/> 35.400	
<input checked="" type="checkbox"/> 35.500 <input checked="" 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	<b>James M. Botti, M.S.</b>	<b>06/05 to present</b>
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	<b>James M. Botti, M.S.</b>	<b>06/05 to present</b>
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	<b>James M. Botti, M.S.</b>	<b>06/05 to present</b>
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	<b>James M. Botti, M.S.</b>	<b>06/05 to present</b>
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):		

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**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.)*

James M. Botti, M.S.

License/Permit Number listing supervising individual

21-01190-05

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**

☒ I attest that **Kevin B. Miller** 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

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## 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

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**AND**

**Second Section**

Complete for all (check all that apply):

☒ I attest that **Kevin B. Miller** 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:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



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

AND

Third Section  
Complete for ALL

☒ I attest that Kevin B. Miller 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

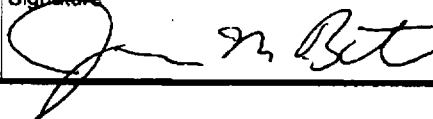
I am the Radiation Safety Officer for St. John Macomb Hospital  
Name of Facility

License/Permit Number: NRC License 21-01190-05

Name of Preceptor

James M. Botti

Signature



Telephone Number

810-599-8817

Date

8-10-07