

Dennis P. O'Dowd
Health Physicist
MATERIALS LICENSING BRANCH



TELECON & FAX TRANSMITTAL

TO: Steve Hill, Nuclear Medicine Dept. or
Robert Frachetti, Manager, Radiology Dept.

FORCHINI
COMPANY: Bell Memorial Hospital

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

PAGES: TEL.: (908) 486-4431FAX #: (908) 485-2370

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

EMAIL:

CONVERSATION RECORD

TIME DATE
11:09 am January 13, 2011

NAME OF PERSON(S) CONTACTED	TELEPHONE NO.	ORGANIZATION
Bob Frachetti, Manager Radiology Department	(908) 485-2035	Bell Memorial 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. 576275, as listed at the top of this memo. We expect to hear from you no later than January 18, 2012.

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

NAME OF PERSON DOCUMENTING CONVERSATION

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

Dennis P. O'Dowd
SIGNATURE

DATE January 13, 2011

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

U.S. NUCLEAR REGULATORY COMMISSION

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE
AND PRECEPTOR ATTESTATION**
[10 CFR 35.50]APPROVED BY OMB: NO. 3150-0120
EXPIRES: MM/DD/YYYY

Name of Proposed Radiation Safety Officer

TODD K BOSTWICK

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:			

NRC FORM 313A (R50)
(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 (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 checked="" type="checkbox"/> 35.100	<input checked="" type="checkbox"/> 35.200
<input checked="" type="checkbox"/> 35.300	<input checked="" type="checkbox"/> 35.400
<input type="checkbox"/> 35.500	<input type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.600 (teletherapy)
	<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		
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 emergency procedures for 35.1000, specify use(s):		

NRC FORM 313A (R30)
(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 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).

NRC FORM 313A (RSO)
(3-2009)

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)

- 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.)

JULIA (SHAN) MARLETTE

License/Permit Number listing supervising individual

21-05432-04

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 _____ 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

NRC FORM 313A (RSO)
(3-2009)

U.S. NUCLEAR REGULATORY COMMISSION

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 Todd Bostwick 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 Todd Bostwick 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:

NRC FORM 313A (RSO)

(3-2009)

U.S. NUCLEAR REGULATORY COMMISSION

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

AND

Third Section
Complete for ALL

☒ I attest that Grade Bostrick 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 Marquette General Health System
Name of Facility

License/Permit Number: 21-05432-04

Name of Preceptor	Signature	Telephone Number	Date
Julia (Shan) Markette	Julia (Shan) Markette	906-225-6967	1-12-12



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ATTN

DENNIS O'DOWD

RADIOLOGY DEPARTMENT

BELL HOSPITAL
FAX COVER SHEET

CONFIDENTIAL

DATE

1/18/12

TO

DENNIS O'DOWD

FROM

DR BASTNICK

SUBJECT/COMMENTS

RSO

8+ Cover

CONFIDENTIALITY NOTICE: THE INFORMATION CONTAINED IN THIS FACSIMILE IS A LEGALLY PRIVILEGED INFORMATION. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US BY TELEPHONE. IF YOU DO NOT RECEIVE ALL PAGES PLEASE NOTIFY US BY PHONE. THANK YOU.

BELL RADIOLOGY PHONE #485-2632

CONTROL # 576-275