



RECRG1 12 23 '13 PM01:06

DATE 12-17-2013

Mr. Lester Tripp
U.S. Nuclear Regulatory Commission
Division of Nuclear Materials Safety
Region I
475 Allendale Road
King of Prussia, PA 19408

Br. 1

RE: Cardiology Associates, LLC
License No: ~~08-2376-01~~ 08-23376-01 *Amg*
Docket No: 03020994

Dear Mr. Tripp:

Please amend the above mentioned license to name Reginald Lamar Robinson, M.D. as the Radiation Safety Officer, and once approved, delete Edward Morris, M.D. as the Radiation Safety Officer.

Documentation of Dr. Robinson's credentials and training are on file with this license and/or attached to this request.

Any questions regarding this request may be directed to the undersigned.

Sincerely,

Edward Morris, M.D.
Radiation Safety Officer

582797

NUREG/REGNI MATERIALS-002

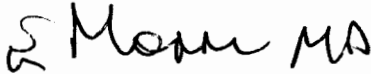
Delegation of Authority

Memo To: Radiation Safety Officer

From: Chief Executive Officer

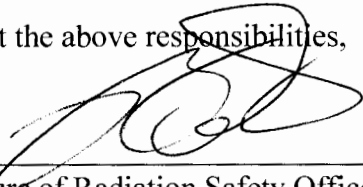
Subject: Delegation of Authority

You, **Reginald Lamar Robinson, M.D.** 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 radioactive material by employees who do not meet the necessary requirements and shutting down operations where justified to maintain 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 eight (8) hours per week conducting radiation protection activities.



Signature of Management Representative

I accept the above responsibilities,



Signature of Radiation Safety Officer

**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

Reginald Lamar Robinson, M.D.

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 | See License Number: 08-23376-01 | | |
| Radiation protection | See License Number: 08-23376-01 | | |
| Mathematics pertaining to the use and measurement of radioactivity | See License Number: 08-23376-01 | | |
| Radiation biology | See License Number: 08-23376-01 | | |
| Radiation dosimetry | See License Number: 08-23376-01 | | |

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 | Cardiology Associates, LLC 2131 K. Street, Suite 800 Washington, DC 20037 License Number: 08-23376-01 | 09/01/2011 - 12/01/2013 |
| Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides | Cardiology Associates, LLC 2131 K. Street, Suite 800 Washington, DC 20037 License Number: 08-23376-01 | 09/01/2011 - 12/01/2013 |
| Securing and controlling byproduct material | Cardiology Associates, LLC 2131 K. Street, Suite 800 Washington, DC 20037 | 09/01/2011 - 12/01/2013 |
| Using administrative controls to avoid mistakes in administration of byproduct material | Cardiology Associates, LLC 2131 K. Street, Suite 800 Washington, DC 20037 License Number: 08-23376-01 | 09/01/2011 - 12/01/2013 |
| Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures | Cardiology Associates, LLC 2131 K. Street, Suite 800 Washington, DC 20037 License Number: 08-23376-01 | 09/01/2011 - 12/01/2013 |
| Using emergency procedures to control byproduct material | Cardiology Associates, LLC 2131 K. Street, Suite 800 Washington, DC 20037 License Number: 08-23376-01 | 09/01/2011 - 12/01/2013 |
| Disposing of byproduct material | Cardiology Associates, LLC 2131 K. Street, Suite 800 Washington, DC 20037 License Number: 08-23376-01 | 09/01/2011 - 12/01/2013 |
| Licensed Material Used (e.g., 35.100, 35.200, etc.)+ <div style="border: 1px solid black; height: 40px; width: 100%; margin-top: 5px;"></div> | Cardiology Associates, LLC 2131 K. Street, Suite 800 Washington, DC 20037 License Number: 08-23376-01 | 09/01/2011 - 12/01/2013 |

+ 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

Edward Morris, M.D.

08-23376-01

This license authorizes the following medical uses:

- | | | | |
|---|--|---|---------------------------------|
| <input type="checkbox"/> 35.100 | <input checked="" 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 | Edward Morris, M.D. Cardiology Associates, LLC License No: 08-23376-01 | 09/01/2011 - 12/01/2013 |
| Radiation safety, regulatory issues, and emergency procedures for 35.300 uses | NA | |
| Radiation safety, regulatory issues, and emergency procedures for 35.400 uses | NA | |
| Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses | NA | |
| Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses | NA | |
| Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses | NA | |
| Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s): | NA | |

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.)* License/Permit Number listing supervising individual

Edward Morris, M.D.

08-23376-01

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

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 Reginald Lamar Robinson, M.D. 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 Reginald Lamar Robinson, M.D. 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:

(05-2012)

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

AND

Third Section
Complete for ALL

☒ I attest that Reginald Lamar Robinson, M.D. 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 Cardiology Associates, LLC
Name of Facility

License/Permit Number: 08-23376-01

Name of Preceptor

Edward Ian Morris, M.D.

Signature

Edward Ian Morris MD

Telephone Number

202-822-9356

Date

12/17/2015

This is to acknowledge the receipt of your letter application dated

12/17/2013, and to inform you that the initial processing which includes an administrative review has been performed.

08-23376-01 (amendment)
☒ 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.

Your action has been assigned **Mail Control Number** 582797.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.