

March 26, 2014

Janice Nguyen  
Division of Nuclear Materials Safety  
USNRC, Region 1  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

**Subject:** Renewal of NRC Radioactive materials license

**Ref:** your latest email on Friday March 21st, 2014 requesting clarifications on St. Vincent's Medical Center application for license renewal.

**License Number:** 06-00843-03

**Docket Number:** 030-01245

**Site:** St. Vincent's Medical Center, 2800 Main Street, Bridgeport, CT 06606

Dear Ms. Nguyen:

Below is an itemized response to your questions as outlined in your email referenced above.

1. The criteria for verification of the HDR clock (date and time) will be the same date and time based on our local date and time with  $\pm 1$  second acceptable difference. We will retain record of each check and a copy of the procedures for three years consistent with 10 CFR 35.2643 and as listed in our updated QA procedures.
- 2a. Concerning the radiation safety officer authority over the authorized users: please see attached delegation of authority to the RSO, Adel Mustafa, Ph.D. This was also sent to the NRC in May 2010.
- 2b. Concerning the expenditure of funds to facilitate the objectives of our radiation safety program and related regulatory requirements: The radiation safety program budget is provided by the department of radiology. The RSO will submit all requests to the administrative director of radiology.
- 2c. Adel Mustafa, Ph.D. is only named on our hospital NRC license. Dr. Mustafa will allocate a minimum of six hours per week on-site time. The RSO will be available for telephone consultation and through email when not on-site.
- 2d. Chengyu Shi, Ph.D., is the in-house representative who will serve as the point of contact when the RSO's is not on-site.
- 2e. When the RSO is not on-site, the RSO is available by phone and by email to respond to questions or operational issues that arise during the conduct of our radiation safety program and related regulatory requirements. The RSO will respond within one hour in the event of an emergency that requires his presence.
3. In regards to our SIR-Spheres program: we will provide training in the licensee's

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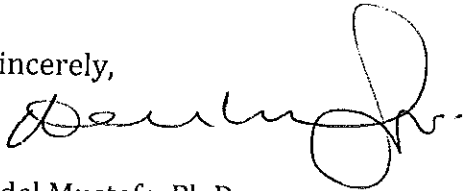
procedures to all individuals involved in Y-90 microsphere use, commensurate with the individual's duties to be performed. The training will be provided to all individuals preparing, measuring, performing dosimetry calculations, or administering Y-90 microspheres.

4. We confirm that if the results of the daily HDR spot checks required by 10 CFR 35.643(d) indicate the malfunction of any system, we will lock the control console in the off position and not use the unit except as may be necessary to repair, replace, or check the malfunctioning system.

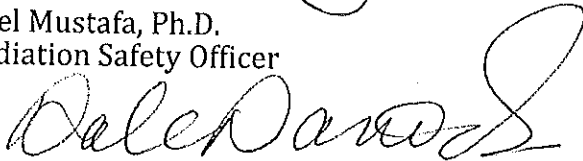
5. In the event a patient would need to be treated on an in-patient basis for reasons other than 35.75, we confirm that dose rate measurements will be performed in surrounding areas to make sure you will be in compliance with public dose limits.

Let me know if you have any questions concerning this matter or contact the hospital radiation safety officer, Adel Mustafa, Ph.D. at 732 580 8071, e-mail [adel.mustafa@stvincents.org](mailto:adel.mustafa@stvincents.org)

Sincerely,



Adel Mustafa, Ph.D.  
Radiation Safety Officer



Dale Danowski MBA, BSN, RN  
Senior VP Chief Operating Officer/Chief Nursing Officer  
St. Vincent's Medical Center  
2800 Main Street  
Bridgeport, CT 06606  
(203) 576-5760 office

St. Vincent's  
Medical Center




Exhibit H

To: Adel Mustafa, Ph.D.  
Radiation Safety Officer

From: Susan L. Davis, RN, Ed.D., CEO

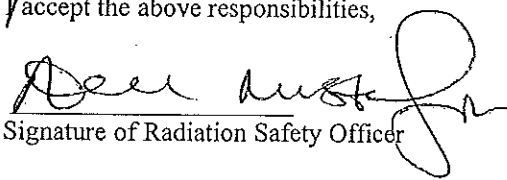
Subject: Delegation of Authority

You, Adel Mustafa, Ph.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 byproduct 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 does not cooperate and does 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 an average of five hours per week conducting radiation protection activities.

  
Signature of Management Representative

5-6-10  
Date


I accept the above responsibilities,

  
Signature of Radiation Safety Officer

5/21/2010  
Date

cc: Affected department heads

Re-issued:

  
Sr. VP Chief Operating  
Officer

3-26-14