

September 14, 2016

United States Nuclear Regulatory Commission
Region III, Materials Licensing
2243 Warrenville Road, Ste 210
Lisle, IL 60532-4352

Re: Amendment to NRC License No. 21-16542-03


We would like to amend our current NRC license to reflect the following changes:

Item #1 Please remove Todd K. Bostwick, M.D. as our Radiation Safety Officer on this license. He will remain an authorized user for 35.100 and 35.200 on this license.

Item #2 Please add William Pyle, C.N.M.T, RT(N) as the new RSO. We have enclosed his preceptor forms and the Letter of Understanding.

If you have any questions or require additional information, please contact our physics consultant, Laura M. Luna Medical Physics Consultants at 734-662-3197 or lluna@mpcphysics.com

Sincerely,



Bob Crumb
Chief Executive Officer
Schoolcraft Memorial Hospital

RECEIVED SEP 19 2016



William Pyle, C.N.M.T, RT(N)
Radiation Safety Officer
Schoolcraft Memorial Hospital
7870 W. U.S. Highway 2
Manistique, MI 49854

Re: Radiation Safety Officer / Executive Management Letter of Understanding

Dear Mr. Pyle,

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 section of regulations requires that you agree in writing to the following:

- 1) Assume responsibility for implementing the Radiation Protection Program
- 2) Ensure that radiation safety activities are being performed in accordance with our own approved procedures and all regulatory requirements.

Furthermore, in compliance with 10 CFR 35.24(e),(g), the executive management of this facility agrees to provide you as RSO:

- 1) Specific written notation of your authority, duties and responsibilities, see attached.
- 2) Sufficient authority, organizational freedom, time, resources, and management prerogative to:
 - a. Identify radiation safety problems;
 - b. Initiate, recommend, or provide corrective actions
 - c. Stop unsafe operations; and,
 - d. 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,

Bob Crumb
Chief Executive Officer

William Pyle, C.N.M.T, RT(N)
Radiation Safety Officer

**RADIATION SAFETY OFFICER TRAINING
AND EXPERIENCE AND PRECEPTOR ATTESTATION
[10 CFR 35.50]**APPROVED BY OMB: NO. 3150-0120
EXPIRES: 06/30/2019

Name of Proposed Radiation Safety Officer

William C. Pyle, BS

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	William Beaumont Hospital	80	9/08-11/09
Radiation protection	William Beaumont Hospital	25	9/08-11/09
Mathematics pertaining to the use and measurement of radioactivity	William Beaumont Hospital	24	9/08-11/09
Radiation biology	William Beaumont Hospital	16.5	9/08-11/09
Radiation dosimetry	William Beaumont Hospital	60	9/08-11/09
Total Hours of Training:		205.5	

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	Schoolcraft Memorial Hospital 21-16542-03	08/10-08/15
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides	Schoolcraft Memorial Hospital 21-16542-03	08/10-08/15
Securing and controlling byproduct material	Schoolcraft Memorial Hospital 21-16542-03	08/10-08/15
Using administrative controls to avoid mistakes in administration of byproduct material	Schoolcraft Memorial Hospital 21-16542-03	08/10-08/15
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures	Schoolcraft Memorial Hospital 21-16542-03	08/10-08/15
Using emergency procedures to control byproduct material	Schoolcraft Memorial Hospital 21-16542-03	08/10-08/15
Disposing of byproduct material	Schoolcraft Memorial Hospital 21-16542-03	08/10-08/15
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ <div>35.100, 35.200</div>	Schoolcraft Memorial Hospital 21-16542-03	08/10-08/15

+ 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
Tom Miles, D.O.	21-16542-03
This license authorizes the following medical uses:	
<input checked="" 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	Tom Miles, D.O.	08/10-08/15
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses		
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):		

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)

<p>Supervising Individual <i>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.)</i></p> <p>Tom Miles, D.O.</p>	<p>License/Permit Number listing supervising individual</p> <p>21-16542-03</p>
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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:

<input checked="" 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 (_____)		

- 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 William C. Pyle, BS _____ 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 _____ 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 William C. Pyle, BS _____ 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:

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

AND

Third Section
Complete for ALL

☒ I attest that William C. Pyle, BS 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 Schoolcraft Memorial Hospital
Name of Facility

License/Permit Number: 21-16542-03

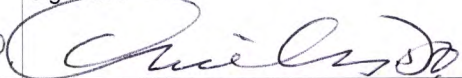
Name of Preceptor

Signature

Telephone Number

Date

Tom R. Miles DO



906 341 1471

9/13/16

Print Batch Labels

FOR UPS SHIPPING ONLY

Page 1 of 1

FROM: (906) 341-3245
WILL PYLE
Schoolcraft Memorial Hospital
7870W US Highway 2
Manistique MI 49854
US

SHIP DATE: 14SEP16
ACTWGT: 1.00 LB
CAD: 109529821/WSX13100

BILL 3rd PARTY

TO
UNITED STATES NUCLEAR REGULATORY
2243 WARRENVILLE ROAD
STE 210
LISLE IL 60532
(906) 341-3245

REF

NV

PO

DEPT: 5500

(US)

FedEx
Ground

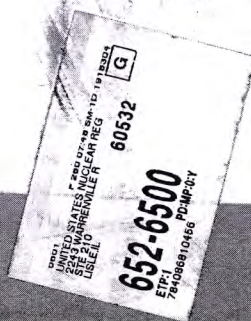


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