



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. STE 210
LISLE, IL 60532-4352

Michael R. Dixon
Nuclear Medicine Manager
Good Samaritan Hospital
520 South 7th Street
Vincennes, IN 47591

NOV 14 2016

Dear Mr. Dixon:

This refers to the letter dated August 22, 2016, requesting an amendment to your NRC byproduct material License No. 13-01787-01.

We have reviewed your letter dated August 22, 2016, and find that we need the information below in order to continue our review.

Please provide only one complete, written response that is currently dated and signed by a senior management official, or by Michael R. Dixon, Nuclear Medicine Department Manager, or by Mr. Beanblossom, as directed in your letter. This will help ensure that your response is processed correctly in our offices.

Please submit your response no later than close of business on November 25, 2016, or contact me to make alternative arrangements.

Your written response should be addressed to my attention at the above address, as "additional information to control number 591836." We will then continue our review. I can be reached at (630) 829-9841 directly. My fax number is (630) 515-1078. My email address is colleen.casey@nrc.gov.

- 1. This refers to your letter dated August 22, 2016, which requests, in part, authorization for Mark Beanblossom as the new Radiation Safety Officer (RSO) for your license.**

We are unable to approve Mr. Beanblossom at this time because the information provided in your letter dated August 22, 2016 was insufficient to complete our review.

If you wish to pursue this matter, please provide a complete, written response that is currently dated and signed by a senior management official for this license, pursuant to 10 CFR 35.12(a).

It should be addressed to my attention at the above address, as "additional information to control number 591836." We will then continue our review.

- A. Neither of the referenced licenses provided with your letter above that show Mr. Beanblossom as RSO have authorization for iridium-192 in 10 CFR 35.600 for high dose rate remote afterloading brachytherapy (HDR) use.**

Therefore, Mr. Beanblossom does not meet the requirements in 10 CFR 35.50 (d) and 35.50 (e). In preparing your written response, you will find it helpful to use the Forms NRC 313a (RSO), available on our website at:

[http://www.nrc.gov/reading-rm/doc-collections/forms/nrc313a\(rso\).pdf](http://www.nrc.gov/reading-rm/doc-collections/forms/nrc313a(rso).pdf)

Also please refer to NUREG 1556 Vol. 9, Rev. 2, on our website at:

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v9/>

Section 8.11 Item 7; Appendix I; Appendix B (for Forms NRC 313a series); Appendix D (including, but not limited to, Section VI, item 2, and Part II "Preceptor Attestation", and Section V.)

B. We noted that Mr. Beanblossom is listed as the RSO on several other NRC and Agreement State licenses. Therefore, in order to complete our review of his authorization as RSO, please provide additional information as follows, in accordance with the response instructions above:

1. It appears that he is already named RSO on several other NRC licenses presently. Please advise us of the exact number of licenses on which you are currently named RSO and please include any and all Agreement State license as well.
2. Please describe how you will be able to devote sufficient time to this license to carry out the RSO duties, given your other RSO responsibilities.
3. Please describe the minimum amount of time you expect to spend serving as RSO for this license over a specified time period, such as "per week" or "per month." Responses such as "as much time as needed" and other non-specific commitments will not be acceptable
4. Please specify what your typical response timeframe would be if you should be needed for emergency response for this license.

C. We noted that the departed RSO, Dr. Zhang, has left the state. He was listed as the only Authorized Medical Physicist (AMP) on your license for the use of the HDR device.

Please advise us as to whether we should remove Dr. Zhang as your AMP also and describe what will happen to your HDR program in the absence of an AMP.

D. We noted that you included a copy of Mr. Beanblossom's consulting contract with your amendment request letter. Please refrain from sending us such extraneous information in the future, unless we specifically request it (an exceedingly rare possibility) as we do not need such information for these purposes.

- E. Your letter also states that Mr. Beanblossom is a Licensed Medical Physicist for the state of Texas and has consulted for you since 1987. Please note that neither of these credentials are acceptable for purposes of considering Mr. Beanblossom as your proposed RSO.
- F. Please be reminded that you must have a qualified RSO in place in order to conduct licensed activities. Your letter did not state when Dr. Zhang left your employment; please tell us when he permanently discontinued performance of his duties under your license.
- G. Please only send us one complete, written response within 10 days of the date of this letter (November 25, 2016) that is currently dated and signed by a senior management official for this license, pursuant to 10 CFR 35.12(a).

Please ensure that our questions/requests are answered completely and explicitly.

Please do not send multiple copies of licensing requests and responses. For example, please do not email a PDF document to us, and a faxed version, and/or a hard copy sent by mail. Only one copy transmitted in only one of these ways is appropriate to prevent administrative processing errors which can delay our review.

Please do not submit resumes, CV's, or any personal, proprietary information that we must protect, in accordance with 10 CFR 2.390, such as social security numbers, dates of birth, home addresses or phone numbers, patient records, college transcripts, etc.

Please note also that it would be quite helpful for you to also include in your response your fax number and email address for our records, in order to have alternate means of reaching you, as the need arises.

Please also be reminded of the provisions in 10 CFR 30.9(a), "Completeness and accuracy of information,"..."(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

Please review NRC Information Notice 2007 – 38: "Ensuring Complete And Accurate Information in the Documentation of Training and Experience For individuals Seeking Approval As Medical Authorized Users," which is located on our website at:

<http://pbadupws.nrc.gov/docs/ML0722/ML072270127.pdf>

Although this IN does not specifically address documentation for proposed RSO's, it does explain the importance and necessity of compliance with 10 CFR 30.9 and the potential consequences of non-compliance, which applies to your request also.

M. Dixon

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In addition, 10 CFR 30.9 applies to all byproduct materials licensees, which includes medical programs, as well as all other types of byproduct material programs.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

A handwritten signature in cursive script that reads "Colleen Carol Casey".

Colleen Carol Casey
Materials Licensing Branch

License No. 13-01787-01
Docket No. 030-01600
Control No. 591836