Hurley Medical Center
One Hurley Plaza
Flint, MI 48503
(810) 262-9835

October 17, 2017

United States Nuclear Regulatory Commission
Region III, Materials Licensing
2443 Warrenville Road, Suite 210
Lisle IL 60532-4352

Re: Amendment to NRC License No. 21-00338-02
Hurley Medical Center

Dear Madam or Sir:

We need to amend our Materials License #21-00338-02 by changing our Radiation Safety Officer from Dr. Ege to Dr. Bansal.

Dr. Bansal is currently an authorized user on our license and we have attached NRC Form 313a(RSO) and the Delegation of Authority to Dr. Bansal as RSO.

Thank you for your assistance with this matter. Please contact Yuwonia Speights, Director of Radiologic Services(YuwoniaSpeights@hurleymc.com) or our consultant, Tracy King, at 734-662-3197 (tking@mpcphysics.com) if you have any questions concerning this matter.

Sincerely,

Amy Benko, V.P. for Patient Care Services

HURLEY MEDICAL CENTER
MEMO

To: Dr. Bansal, Nuclear Medicine Radiation Safety Officer

From: Melany Gavulic, CEO & President

Subject: Delegation of Authority

You, Dr. Bansal, have been appointed Radiation Safety Officer for the Nuclear Medicine Department at Hurley Medical Center 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. We currently contract Medical Physics Consultants, Inc. to assist with radiation safety oversight, therefore, it is estimated that you will spend no more than 1-2 hours per week overseeing our radiation safety program.

Signature of CEO
Melany Gavulic

10-17-17
Date

I accept the above responsibilities,

Anish Bansal, M.D.

10/18/17
Date

cc: Amy Benko, V.P. for Patient Care Services
Yuwonia Speights-Beaugard, Director of Radiology

NRC FORM 313A (RSO) (05-2012) 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: (05/31/2015)

Name of Proposed Radiation Safety Officer

Anish Bansal, 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 (Y-90 Theraspheres)

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:			

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(05-2012)
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)
(05-2012)

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:

☐ 35.100 ☐ 35.200 ☐ 35.300 ☐ 35.400
☐ 35.500 ☐ 35.600 (remote afterloader) ☐ 35.600 (teletherapy)
☐ 35.600 (gamma stereotactic radiosurgery) ☐ 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	Gurkan Ege, M.D. Hurley Medical Center, Inc.	2013-2016
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	Gurkan Ege, M.D. Hurley Medical Center	2013-2016
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 (RSO) (05-2012) 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.)*	License/Permit Number listing supervising individual
Gurkan Ege, M.D.	21-00338-02

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 (Y-90 Therapheres)

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. 21-00338-02

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) (05-2012) 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 Anish Bansal, 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 Anish Bansal, 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:

Y-90 Theraspheres

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

AND

Third Section
Complete for ALL

☑ I attest that Anish Bansal, 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 Hurley Medical Center
(Name of Facility)

License/Permit Number: 21-00338-02

Name of Preceptor	Signature	Telephone Number	Date
Gurken Ege, M.D.	Gurken Ege	248-605-5884	6-14-2017

HURLEY MEDICAL CENTER
ONE HURLEY PLAZA
FLINT, MI 48503-5993

FACSIMILE TRANSMISSION FORM

Date: 10-18-17 Fax Phone # Called: 630-515-1078

To: Colleen Casey Contact Phone #: 1-800-829-9500 EXT. 9841

From: Yuwonia Speights Fax Phone #: 810-262-9047

ON Behalf of Anish Bansal, MD

Dept: XRAY Contact Phone #: 810-262-9835

Number of pages sent (including cover sheet): 9

Remarks: Additional Information to Control Number 599881. Thank you -

If the received fax is not legible or complete, please call for re-sending.