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October 26, 2018

USNRC
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: Amendment Request License No. 21-01430-01
We respectfully request expedition of our change in Radiation Safety Officer.

Our Radiation Safety Officer, Martin Johnson, died unexpectedly. We have appointed Tracy I. King-Maudrie and Dawn Edwards as temporary Radiation Safety Officers as they both have extensive experience as either an employee or as a consultant at this facility.

Please list Tracy I King-Maudrie as our Radiation Safety Officer and as an Authorized Medical Physicist. Tracy will be performing our RSO duties until we can hire a new RSO. The following information supports our choice to have Tracy fill the RSO position.

Tracy I. King-Maudrie, M.S.

- Was a medical physicist at our facility from 2003-2013
- Worked closely with our RSO on all radiation safety issues
- Was listed as an AMP on our license within the last 7 years (Amendment 113)
- Was an integral part of our Increased Controls/Part 37 program while on staff
- Was granted Trustworthy and Reliable status until she resigned in 2013
- Has been preceptored by an RSO for the same uses as our license (313 RSO form enclosed)
- Has been delegated the responsibility and authority by our management necessary to perform the RSO duties (delegation form enclosed)
- Is undergoing the renewal of her T&R status by our Reviewing Officials

Thank you for your assistance with this matter. If you have any questions concerning this amendment request, please feel free to contact Dan Phillips at Dan.Phillips@sparrow.org. Dawn Edwards at dedwards@mpcphysics.com or Tracy King at tking@mpcphysics.com 517-294-2072.

Respectfully,

A handwritten signature in blue ink, appearing to read "Thomas Ostrander", is written over a horizontal line.

Thomas Ostrander - VP of Professional Services
Certifying Official
Sparrow Health System

RECEIVED NOV 01 2018

1200 E. Michigan Avenue
P.O. Box 30480
Lansing, Michigan 48909-7980

T 517.364.1000
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Date: October 26, 2018

To: Tracy I King-Maudrie Radiation Safety Officer

From: Thomas Ostrander
VP Professional Services / Certifying Official

Subject: Delegation of Authority to Temporary RSO

You, Tracy King-Maudrie, have been appointed Radiation Safety Officer for Edward W. Sparrow Hospital and are responsible for ensuring the safe use of radiation as authorized by our NRC license.

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.

A blue ink signature of Thomas Ostrander, written over a horizontal line.

Thomas Ostrander
VP of Professional Service / Certifying Official

The date "10/30/18" is handwritten in blue ink above a horizontal line.

Date

I accept the above responsibilities,

A black ink signature of Tracy I King-Maudrie, written over a horizontal line.

Tracy I King-Maudrie, M.S.

The date "10-29-18" is handwritten in black ink above a horizontal line.

Date

cc: affected department heads

Joseph Wissing
11101 Bethel Church Road
Manchester, Michigan 48158
(734) 497-6499
joseph@tm.net

October 12, 2018

DNMS/Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

To whom it may concern,

This letter serves as my summary attestation in support of Tracy I. King-Maudrie as Radiation Safety Officer (RSO) on a Nuclear Regulatory Commission (NRC) license. I am currently named as RSO on the St. Joseph Mercy Health System NRC license and qualified to serve as preceptor for medical uses under 10 CFR 35.100, 35.200, 35.300, 35.400, 35.500, and 35.600. My history of health and medical physics work experience extends 30+ years.

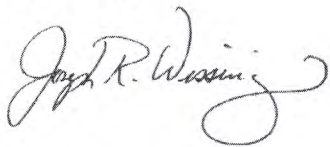
As an ABR board certified medical physicist for more than 25 years, Tracy currently provides consultative and medical physics support to our licensed program regarding medical uses under 10 CFR 35.100, 35.200, 35.300, 35.400, 35.500. Within the past 5 years, she was listed on the Licensee's NRC license as an authorized medical physicist for 10 CFR 35.600 consistent with 10 CFR 35.59. She is a recognized expert in these areas of medical use of radioactive materials. Her previous employment gives her first-hand knowledge of the Licensee's licensed operations and Radiation Safety Program requirements.

From December 2017 to the present, I have personally discussed and reviewed NRC regulatory requirements for uses authorized under 10 CFR 35.100, 35.200, 35.300, 35.400, 35.500, and 35.600 uses. In addition, we have extensively reviewed current regulatory requirements of 10 CFR 37, including details related to their source of concern.

Tracy has the requisite training, experience, maintained appropriate continuing education with regulatory requirements and best practices for the radiation safety aspects and safe use of byproduct material. She has a level of radiation safety knowledge sufficient to function independently as a Radiation Safety Officer for the medical uses authorized on the license seeking to name her as RSO.

Please contact me if any additional information is required.

Respectfully,

A handwritten signature in cursive script, reading "Joseph R. Wissing". The signature is written in dark ink and is positioned below the word "Respectfully,".

Joseph Wissing



**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

Tracy I King-Maudrie

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			
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Radiation biology			
Radiation dosimetry			
Total Hours of Training:		<input type="text"/>	

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.)+ <div style="border: 1px solid black; height: 40px; width: 100%; margin-top: 5px;"></div>		

+ 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												
<p>This license authorizes the following medical uses:</p> <table style="width: 100%;"> <tr> <td><input type="checkbox"/> 35.100</td> <td><input type="checkbox"/> 35.200</td> <td><input type="checkbox"/> 35.300</td> <td><input type="checkbox"/> 35.400</td> </tr> <tr> <td><input type="checkbox"/> 35.500</td> <td><input type="checkbox"/> 35.600 (remote afterloader)</td> <td><input type="checkbox"/> 35.600 (teletherapy)</td> <td></td> </tr> <tr> <td><input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)</td> <td><input type="checkbox"/> 35.1000 (_____)</td> <td></td> <td></td> </tr> </table>		<input type="checkbox"/> 35.100	<input 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 (_____)		
<input type="checkbox"/> 35.100	<input 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	Joseph R Wissing of St Joseph Mercy Health System discussed and reviewed regulations and radiation safety procedures concerning these uses of radioactive materials.	01/18 - 09/18 numerous days over this time period
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	Joseph R Wissing of St Joseph Mercy Health System discussed and reviewed regulations and radiation safety procedures concerning these uses of radioactive materials.	01/18 - 09/18 numerous days over this time period
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	Joseph R Wissing of St Joseph Mercy Health System discussed and reviewed regulations and radiation safety procedures concerning these uses of radioactive materials.	01/18-09/18 numerous days over this time period
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	Joseph R Wissing of St Joseph Mercy Health System discussed and reviewed regulations and safety procedures concerning these uses of radioactive materials.	01/18 - 09/18 numerous days over this time period
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)

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.)*

Joseph R Wissing

License/Permit Number listing supervising individual

21-00943-03

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. 21-01430-01
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 Tracy I King-Maudrie 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 Tracy I King-Maudrie 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)

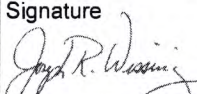
AND

**Third Section
Complete for ALL**

☒ I attest that Tracy I King-Maudrie 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 St Joseph Mercy Health System
Name of Facility
License/Permit Number: 21-00943-03

Name of Preceptor Joseph R. Wissing	Signature  Joseph R. Wissing	Telephone Number 734-497-6499	Date 10/12/18
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