

December 18, 2018

Nuclear Materials Licensing Branch
Nuclear Regulatory Commission Region III
ATTN: Colleen Casey
2443 Warrenville Road Suite 210
Lisle, IL 60532-4352

Re: Materials License No. 21-05432-04

Control Number: 610396

Ms. Casey,

Enclosed you will find the additional information requested pertaining to control number 610396. We had originally sent this request on August 24th 2018; however, it has come to light that the request was never received.

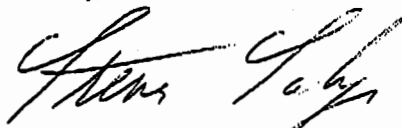
This letter is to request authorization of Dr. John Cox as Radiation Safety Officer for the license listed above by February 1st 2019. Enclosed are the application form 313A (RSO), Letter of Understanding, and Preceptor Statement by the current RSO, Dr. John Pap. Dr. Pap will still be listed as an authorized user under 35.100 and 35.200, as he is still employed with UPHSM, and available to assist Dr. Cox as needed.

Dr. Cox has education, familiarization, and training for 35.100, 35.200, and 35.300. He has recently completed education and instruction in radiation safety, regulatory issues and emergency procedures for 35.100, 35.200 and 35.300 as applicable by Dr. John Pap. At present we are not performing 35.400 manual brachytherapy. It has yet to be determined whether UPHSM will be getting new sources or HDR when our new facility is completed.

Mrs. Janice Chudy polled the Radiation Safety Committee members and received unanimous approval by the voting members for this request.

If you have further questions, please contact Jan Chudy, CNMT, or Katelyn Burford, CNMT at (906) 225-3545 or email at janice.chudy@mghs.org or katelyn.burford@mghs.org.

Sincerely,



Steven Salyer, Chief Operating Officer

RECEIVED DEC 18 2018

August 23, 2018

John Cox, D.O.
UP Health System-Marquette
420 W. Magnetic Street
Marquette, MI 49855

Dear Dr. Cox,

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


- Assume responsibility for implementing the Radiation Safety Program
- 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:

- Specific written notation of your authority, duties, and responsibilities
- Sufficient authority, organizational freedom, time resources and management prerogative to:
 - Identify radiation safety problems;
 - Initiate, recommend, or provide corrective actions;
 - Stop unsafe operations; and
 - Verify implementation of corrective actions.

Our signatures 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,


Steven Salzer, Chief Operating Officer


John Cox, D.O., R.S.O.

NRC FORM 313A (RSO)
(06-2016)

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: 06/30/2019

Name of Proposed Radiation Safety Officer

Dr John Phillip Cox

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 spheres)

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"/>			

NRC FORM 313A (RSO)
(08-2016)

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.)+ <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).

NRC FORM 313A (RSO)
(06-2016)

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

Dr John Michael Pap

21-05432-04

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 (4-90)

- 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. 21-05432-04
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)
(06-2016)

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 John Cox 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 John Cox 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 Microspheres
1.08 Curies total

NRC FORM 313A (RSO)
(08-2018)

U.S. NUCLEAR REGULATORY COMMISSION

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

AND

Third Section
Complete for ALL

☒ I attest that John Cox 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

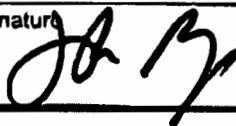
I am the Radiation Safety Officer for V.P. Health Systems: Marquette
Name of Facility

License/Permit Number: 21-05432-04

Name of Preceptor

John Pap

Signature



Telephone Number

906-225-3868

Date

8-13-18

**UP HEALTH SYSTEM - MARQUETTE
DEPARTMENT OF NUCLEAR MEDICINE**

Redacted 1/16/19 C. Casey

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To: US NRC : ATTN: Colleen Casey

FAX Number: 630 515 1078

Date: 12-18-18

Time: 9:00 AM EST

From: UPHS Marquette Nuclear Medicine - Katelyn Burford

Number of pages including cover sheet: 9

Message: Colleen:

Here is the additional information you
requested per our conversation yesterday
(12-17-18).

Please let me know if you need
anything else

Katelyn Burford CNMT
906-225-3545

Nuclear Medicine Office fax number:
Nuclear Medicine Department phone number:
Radiology Directors fax number

906-225-4731
906-225-3545
906-225-4250

MSW:I-24-01 Marquette general hospital fax

NRC FORM 313A (RSO)
(08-2018)

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:	
<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 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.600 (teletherapy)
	<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	John Pap, RSO	May / June 2018
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	John Pap, RSO	May / June 2018
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	N/A - see cover letter	
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses	N/A	
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses	N/A	
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses	N/A	
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s): y-90 sirspheres	John Pap, RSO	May / June 2018