



Improving the health of the people in our communities by  
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December 17, 2018

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

Re: Additional Information Amendment Request License No. 21-01430-01 Control No.  
610375

Attn: Colleen Casey

Dear Colleen:

Attached, please find the following documents:

- A revised Delegation of Authority to reflect all the uses under our license
- Documentation of additional training requested for Tracy King-Maudrie
- A revised attestation letter from Tracy's preceptor

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](mailto:Dan.Phillips@sparrow.org), Dawn Edwards at [dedwards@mpcphysics.com](mailto:dedwards@mpcphysics.com) or Tracy King at [tking@mpcphysics.com](mailto:tking@mpcphysics.com) 517-294-2072.

Respectfully,

Tom Ostrander,  
VP Professional Services / Certifying Official  
Sparrow Health System



improving the health of the people in our communities by  
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Date: December 14, 2018

To: Tracy I. King-Maudrie, Radiation Safety Officer


From: Thomas Ostrander  
VP Professional Services / Certifying Official

Subject: Delegation of Authority for Radiation Safety Officer

You, Tracy King-Maudrie, have been appointed radiation safety officer and are responsible for ensuring the safe and secure 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; verifying implementation of corrective actions, stopping unsafe activities; and ensuring compliance with regulations.

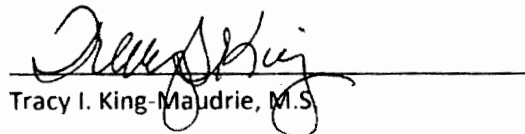
You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time.

This delegation of authority includes all NRC authorized uses, including the self-shielded irradiator. It is estimated that you will spend approximately 8 hours per week conducting radiation protection activities.

  
Thomas Ostrander  
VP of Professional Service / Certifying Official

12-19-18  
Date

I accept the above responsibilities,

  
Tracy I. King-Maudrie, M.S.

12-14-18  
Date

cc: Affected department heads

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

December 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 revised summary attestation in support of Tracy L. King-Maudrie to be named 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 for the medical and research use of radioactive materials 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 and emergency procedures for medical uses authorized under 10 CFR 35.100, 35.200, 35.300, 35.400, 35.500, and 35.600. In addition, we have extensively reviewed current regulatory requirements of 10 CFR 37, including emergency procedures, 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,



Joseph Wissing

**Self- Shielded Irradiator Training Program for Tracy King-Maudrie, MS, RSO**

Tracy has had extensive training and has been an instructor at radiation safety officer training courses in the past 5 years. She has completed additional training as it pertains to self-irradiator use in the following topics.

**Radiation Safety**

- Characteristics of types of radiation
- Units of radiation dose and quantity of radioactive
- Radiation vs. contamination
- Internal vs. external exposure
- Biological effects of radiation
- Types and relative hazards of radioactive material possessed
- ALARA concept
- Use of time, distance, and shielding to minimize exposure
- Use of radiation detection instruments

**Regulatory Requirements**

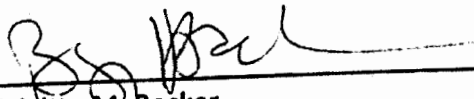
- Applicable Requirements of Title 10 CFR Parts 19, 20, 21 and 30
- Locations of use and storage of radioactive materials and devices containing radioactive materials
- Material control and accountability
- Security of radioactive materials and devices containing radioactive materials
- Annual reviews of radiation safety program content and implementation
- License conditions, amendments and renewals
- Occupational and public dose limits
- Transfer and disposal
- Applicable U.S. DOT regulations and 10 CFR 71
- Recordkeeping
- Reporting requirements for nationally tracked sources
- Reporting requirements for theft or loss, incidents, exposures, etc.
- Licensing and inspection by regulatory agency
- Need for complete and accurate information
- Employee Protection (10 CFR 30.7)
- Deliberate misconduct (10 CFR 30.10)
- Security (10 CFR 37)

**Practical Explanation of the Theory and Operation of Irradiator**

- Routine vs. non-routine maintenance
- Operating and emergency procedures
- Prior events involving self-shielded irradiators

Training was in the form of self-study and lecture, with hands-on demonstrations, emphasizing practical subjects important to the safe use of the self-shielded irradiator.

I confirm that Tracy King-Maudrie has completed training on December 14, 2018 for the Self-Shielded Irradiator and I have personally assisted in this training, including hands on training with the self-shielded irradiator. I confirm that Tracy has reviewed all procedures, including emergency procedures, for operation of the IBL Blood irradiator and has completed 8 hours of hands-on experience with the self-shielded irradiator.

  
Brigitte M. Becker  
Authorized User License 21-01430-01

12/14/18  
Date

## Casey, Colleen

---

**From:** Phillips, Daniel <Dan.Phillips@SPARROW.ORG>  
**Sent:** Friday, December 21, 2018 12:07 PM  
**To:** Casey, Colleen  
**Cc:** Tracy King; 'Dawn Edwards'  
**Subject:** [External\_Sender] additional information to control number 610375  
**Attachments:** RSO Cover Letter & Delegation of Authority 12.19.18.pdf

Hello, Colleen:

Please see the attached packet. Tracy and I have reviewed the packet and we believe it contains the additional information you requested.

Please let us know if you have additional questions or requirements.

License No. 21-01430-01  
Docket No. 030-02009  
Control No. 610375

Thanks so much for your assistance through this process.

Dan Phillips  
Administrative Director  
Sparrow Cancer Center

Work: 517.364.9425  
Cell: 517.643.4848  
Fax: 517.364.2260  
Email: [dan.phillips@sparrow.org](mailto:dan.phillips@sparrow.org)



**From:** Casey, Colleen <Colleen.Casey@nrc.gov>  
**Sent:** Monday, December 10, 2018 6:24 PM  
**To:** Phillips, Daniel <Dan.Phillips@SPARROW.ORG>  
**Cc:** Tracy King <tking@mpcphysics.com>; 'Dawn Edwards' <dedwards@mpcphysics.com>  
**Subject:** [EXTERNAL] RE: RE: [External\_Sender] Conference Call - NRC License 21-01430-01

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That's no problem. I have to use a specific date as a placeholder/goal that is reasonable. If getting it done and faxed to us by Dec. 28<sup>th</sup> works better, that's fine too. I expect to be working through most of the holidays. Hope this helps.

Colleen

**From:** Phillips, Daniel [mailto:Dan.Phillips@SPARROW.ORG]  
**Sent:** Monday, December 10, 2018 5:05 PM  
**To:** Casey, Colleen <Colleen.Casey@nrc.gov>  
**Cc:** Tracy King <tking@mpcphysics.com>; 'Dawn Edwards' <dedwards@mpcphysics.com>  
**Subject:** [External\_Sender] RE: [External\_Sender] Conference Call - NRC License 21-01430-01

Hello, Colleen.

I would like to request an additional nine (9) calendar days beyond the December 12, 2018 deadline to submit the requested information needed for review of the RSO change for NRC Materials License No. 21-01430-01 (E.W. Sparrow Hospital). Because additional training dates are scheduled to take place soon, we are confident we can provide you with the requested documentation by Friday December 21, 2018. If you would like this request for an alternative timeframe sent on Organizational Letterhead, please let me know. Thanks for considering our request.

License No. 21-01430-01  
Docket No. 030-02009  
Control No. 610375

Respectfully,

Dan Phillips  
Administrative Director  
Sparrow Cancer Center

Work: 517.364.9425  
Cell: 517.643.4848  
Fax: 517.364.2260  
Email: [dan.phillips@sparrow.org](mailto:dan.phillips@sparrow.org)



-----Original Appointment-----

**From:** Casey, Colleen <Colleen.Casey@nrc.gov>  
**Sent:** Thursday, November 15, 2018 4:02 PM  
**To:** Phillips, Daniel  
**Subject:** [EXTERNAL] Accepted: [External\_Sender] Conference Call - NRC License 21-01430-01  
**When:** Monday, November 19, 2018 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** 1-877-820-7831; Passcode: 802464#

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Dear Mr. Phillips,  
Having a call at 1:00pm on Monday Nov. 19, 2018, should be fine. However, I am not in the office today or tomorrow and cannot fax the letter to the three of you until Monday afternoon, which is the soonest I will return to my office.

It's the same letter as the one you received; I was just offering to fax it this past Tuesday to get it to you all a bit sooner but I did not have your fax number until just now.

I will plan on the call on Monday then. If you plan on getting copies of the letter to Dawn and Tracy and you have the original yourself, I'll assume that there is no longer a need for faxing anything unless you advise me otherwise.

Thanks very much. Talk with you Monday then.

Colleen

*(Please address me as "Colleen")*

Colleen Carol Casey, [Colleen.Casey@nrc.gov](mailto:Colleen.Casey@nrc.gov)

Materials Licensing Reviewer

U.S. Nuclear Regulatory Commission

Region III

2443 Warrenville Road

Suite 210

Lisle, IL 60532-4352

[Colleen.Casey@nrc.gov](mailto:Colleen.Casey@nrc.gov)

(630) 829-9841 Direct, Central time zone

(630) 515-1078 Best Fax No., to our IM Center

NRC 24 HR Operations Center, Rockville, Maryland

(301) 816-5100 (Eastern time zone)

Gentle Reminders: Unless previously arranged with or requested by me directly, please do *not* submit any unsolicited licensing requests, responses or correspondence via e-mail. Faxing only one complete copy via only one means of transmission is usually quickest and best.

Please only submit *one complete, physically and legibly signed* copy of your correspondence to us. "Draft," *unsigned, electronically signed or illegibly signed documents will not be accepted.*

Please prepare your licensing requests in accordance with the most recent Final version of NUREG 1556

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

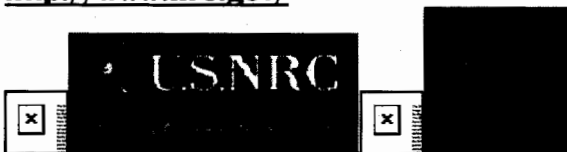
Thank you very much!

Please also note that my full-time work schedule includes every other Friday off.

Ensuring the health and safety of our people, our nation

and our environment

<http://www.nrc.gov/>



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N/A CCK  
12-21-18