

Hill, Carol

From: Hanson, Latischa
Sent: Tuesday, January 15, 2019 11:58 AM
To: Hill, Carol
Subject: FW: Amendment Request RAM License #25-18361-01
Attachments: Amendment Request - Add AU.pdf; 25-18361-01 Lic. Admen. Add ARSO.pdf

From: Daniel Dugan [mailto:dan@hpnw.com]
Sent: Tuesday, January 15, 2019 11:54 AM
To: Hanson, Latischa <Latischa.Hanson@nrc.gov>
Subject: [External_Sender] Amendment Request RAM License #25-18361-01

Latischa:

Please find attached an amendment request to add an Assistant RSO to Community Medical Center's license.

Also, while reviewing our license, I noted that two AUs that we had requested additional authorizations for on September 25, 2017 have not been updated. I have attached that email below. Can you please let me know if we need to do anything else to get them added?

Thank you!

Dan Dugan, MS, DABR
Medical Physicist
HEALTH PHYSICS NORTHWEST
503-620-6617 Office
503-684-5548 Fax
<http://www.hpnw.com/>



*Amendment 39 was issued
Oct 3, 2018 and added Drs
Zimmer and Benson*

PUBLIC
☐ Immediate Release
☒ Normal Release

NON-PUBLIC
☐ A.3 Sensitive-Security Related
☐ A.7 Sensitive Internal
☐ Other: _____

Reviewer: *[Signature]* Date: 1-18-19

From: Daniel Dugan
Sent: Monday, September 25, 2017 11:55 AM
To: carol.hill@nrc.gov
Cc: Ryan-O'Hara, Kimberly
Subject: Amendment Request RAM License #25-18361-01

Carol:

Attached is a written request to amend our license to add two AUs for radioactive seed localization procedures. If you have any questions, please don't hesitate to contact me.

Dan Dugan, MS, DABR
Medical Physicist
HEALTH PHYSICS NORTHWEST
503-620-6617 Office
503-684-5548 Fax
<http://www.hpnw.com/>



PLEASE NOTE: Our office is now located at 7525 SE Lake Road, Milwaukie, OR 97267.



HPNW
HEALTH PHYSICS NORTHWEST

September 25, 2017

Carol Hill
Licensing Assistant
U.S. Nuclear Regulatory Commission, Region IV
1600 East Lamar Boulevard
Arlington, Texas 76011-4511

RE: 25-18361-01 License amendment to add AU's

Carol:

This letter serves as a written request to add Dr. Benson and Dr. Zimmer as authorized users under 10 CFR 35.1000 to perform radioactive seed localizations using Pd-103 and I-125. Please find attached letters of attestation from Dr. Stewart regarding their training and competency.

If you have any questions, please contact me.

Sincerely,

Dan Dugan, MS, DABR
Radiation Safety Officer
Community Medical Center

Encl.



2827 Fort Missoula Road
Missoula, MT 59804
TEL (406) 728-4100
www.communitymed.org

From day one.

PRECEPTOR ATTESTATION:

I attest that Adam Benson, M.D. has performed three (3) cases for Radioactive Seed Localization (RSL) under my supervision as an authorized user with the following supervised work experience:

1. Performed radiation surveys as needed using proper instrumentation.
2. Implanted sealed sources safely, including the use of handling tools to manipulate seeds and the proper use of shields, if needed.
3. Monitored the routine use of sealed sources before, during and after the procedure.

The cases were performed on 5/3/17, 5/19/17 and 6/1/17.

Additional training included instruction on the following topics:

1. Applicable regulations
2. RSL program policies and procedures
3. Radiation safety (source handling) issues
4. Inventory and security of radioactive seeds
5. Implanting and removing RSL sources safely
6. Performing surveys with a survey meter
7. Emergency procedures, including how to respond to a lost or leaking source.

Dr. Benson is an Authorized User on NRC RAM license #25-18361-01 for 35.100, 35.200 and 35.300 and is therefore well experienced in radiation safety and now has achieved a level of competency sufficient to function independently as an authorized user for RSL procedures covered in 10 CFR 35.1000.

Name of Proctor: Michael A. Stewart, M.D.

Signature: *Michael A. Stewart*

Date: 8/22/17



From day one.

2827 Fort Missoula Road
Missoula, MT 59804

TEL (406) 728-4100
www.communitymed.org

PRECEPTOR ATTESTATION:

I attest that Roy W. "Chip" Zimmer, III, M.D. has performed three (3) cases for Radioactive Seed Localization (RSL) under my supervision as an authorized user with the following supervised work experience:

1. Performed radiation surveys as needed using proper instrumentation.
2. Implanted sealed sources safely, including the use of handling tools to manipulate seeds and the proper use of shields, if needed.
3. Monitored the routine use of sealed sources before, during and after the procedure.

The cases were performed on 6/15/17, 6/22/17 and 8/25/17.

Additional training included instruction on the following topics:

1. Applicable regulations
2. RSL program policies and procedures
3. Radiation safety (source handling) issues
4. Inventory and security of radioactive seeds
5. Implanting and removing RSL sources safely
6. Performing surveys with a survey meter
7. Emergency procedures, including how to respond to a lost or leaking source.

Dr. Zimmer is already on NRC RAM license #25-18361-01 as an Authorized User for 35.100, 35.200, 35.300 and 35.11 and is therefore well experienced in radiation safety and now has achieved a level of competency sufficient to function independently as an authorized user for RSL procedures covered in 10 CFR 35.1000.

Name of Proctor: Dr. Michael A. Stewart

Signature: *Michael A. Stewart MD*

Date: *9/8/2017*



HPNW
HEALTH PHYSICS NORTHWEST

January 15, 2019

Materials Licensing Branch
USNRC Region IV
1600 East Lamar Boulevard
Arlington, Texas 76011-4511

RE: 25-18361-01 License amendment add RSO

To Whom It May Concern:

Enclosed is the NRC form 313A (RSO) to support the addition of Adam Davis, MS
as Associate Radiation Safety Officer at Community Medical Center.

If you have any questions, please contact me.

Sincerely,

Dan Dugan, MS, DABR
Radiation Safety Officer
Community Medical Center

Encl.

**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

Adam Davis, MS

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 (I-125 RSL)

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 | Purdue University | 75 | Aug 2015 - May 2017 |
| Radiation protection | Purdue University | 30 | Aug 2015 - May 2017 |
| Mathematics pertaining to the use and measurement of radioactivity | Purdue University | 45 | Aug 2015 - May 2017 |
| Radiation biology | Purdue University | 45 | Aug 2015 - May 2017 |
| Radiation dosimetry | Purdue University | 45 | Aug 2015 - May 2017 |
| Total Hours of Training: | | 240 | |

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 | Community Medical Center / 25-18361-01 | Aug 2017 - Aug 2018 |
| Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides | Community Medical Center / 25-18361-01 | Aug 2017 - Aug 2018 |
| Securing and controlling byproduct material | Community Medical Center / 25-18361-01 | Aug 2017 - Aug 2018 |
| Using administrative controls to avoid mistakes in administration of byproduct material | Community Medical Center / 25-18361-01 | Aug 2017 - Aug 2018 |
| Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures | Community Medical Center / 25-18361-01 | Aug 2017 - Aug 2018 |
| Using emergency procedures to control byproduct material | Community Medical Center / 25-18361-01 | Aug 2017 - Aug 2018 |
| Disposing of byproduct material | Community Medical Center / 25-18361-01 | Aug 2017 - Aug 2018 |
| Licensed Material Used (e.g., 35.100, 35.200, etc.)+ <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> <u>35.100, 35.200, 35.300</u> <u>35.600 (remote afterloader)</u> <u>35.1000 (I-125 RSL)</u> </div> | Community Medical Center / 25-18361-01 | Aug 2017 - Aug 2018 |

+ 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 | | |
| Dan Dugan, MS, DABR | 25-18361-01 | | |
| This license authorizes the following medical uses: | | | |
| <input checked="" type="checkbox"/> 35.100 | <input checked="" type="checkbox"/> 35.200 | <input checked="" type="checkbox"/> 35.300 | <input type="checkbox"/> 35.400 |
| <input type="checkbox"/> 35.500 | <input checked="" type="checkbox"/> 35.600 (remote afterloader) | <input type="checkbox"/> 35.600 (teletherapy) | |
| <input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery) | <input checked="" type="checkbox"/> 35.1000 (I-125 RSL) | | |

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 | Dan Dugan, MS, DABR | Aug 2017 - Aug 2018 |
| Radiation safety, regulatory issues, and emergency procedures for 35.300 uses | Dan Dugan, MS, DABR | Aug 2017 - Aug 2018 |
| 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 | Dan Dugan, MS, DABR | Aug 2017 - Aug 2018 |
| 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): | Dan Dugan, MS, DABR (I-125 RSL) | Aug 2017 - Aug 2018 |

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 <i>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.)</i> | License/Permit Number listing supervising individual |
| Dan Dugan, MS, DABR | 25-18361-01 |

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 (I-125 RSL)

- 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.
- 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 Adam Davis, MS _____ 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 _____ 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 Adam Davis, MS has training in the radiation safety, regulatory issues, and emergency procedures for the following types of use:
Name of Proposed Radiation Safety Officer

☒ 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:

I-125 RSL

611309

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

AND

Third Section
Complete for ALL

☒ I attest that Adam Davis, MS 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 RCHP Billings - Missoula LLC dba Community Medical Center
Name of Facility

License/Permit Number: 25-18361-01

| | | | |
|---------------------|---|------------------|------------|
| Name of Preceptor | Signature | Telephone Number | Date |
| Dan Dugan, MS, DABR |  | (503) 620-6617 | 01/15/2019 |



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee

Mr. Daniel C. Dugan, M.S.
Radiation Safety Officer
RCHP Billings – Missoula LLC
dba Community Medical Center
2827 Fort Missoula Road
Missoula, MT 59804

Date

02/12/2019/2019

License Number(s)

25-18361-01

Mail Control Number(s)

611309

Licensing and/or Technical Reviewer or Branch

C. Hill

This is to acknowledge receipt of your: ☒ Letter and/or ☐ Application Dated: 01/15/2019

The initial processing, which included an administrative review, has been performed.

☒ Amendment ☐ Termination ☐ New License ☐ Renewal

☐ There were no administrative omissions identified during our initial review.

☐ This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

☐ Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>
Follow the instructions on the form for submission.

☐ The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region IV
U. S. Nuclear Regulatory Commission
DNMS/NMSB - B
1600 E. Lamar Boulevard
Arlington, TX 76011-4511
(817) 200-1103 or (817) 200-1140

✓ 2/12

BETWEEN:

Accounts Receivable/Payable
and
Regional Licensing Branches

[FOR ARPB USE]
INFORMATION FROM WBL

Program Code: 02230
Status Code: Pending Amendment
Fee Category: 7C
Exp. Date: 10/31/2023
Fee Comments: CODE 23
Decom Fin Assur Reqd: N

License Fee Worksheet - License Fee Transmittal

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: RCHP Billings - Missoula LLC
Received Date: 01/15/2019
Docket Number: 3014921
Mail Control Number: 611309
License Number: 25-18361-01
Action Type: Amendment

2. FEE ATTACHED

Amount: _____

Check No.: _____

3. COMMENTS

Signed: _____

Date: _____

Carol L. Heie
2/12/19

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / /)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment: _____

Renewal: _____

License: _____

3. OTHER _____

Signed: _____

Date: _____