



## Consulting Radiologists, Ltd.

700 Soo Line Building • 105 South Fifth Street • Minneapolis, MN 55402-1250

Telephone: (612) 338-6412 Fax: (612) 337-8469

### GENERAL RADIOLOGY

William J. Boardman, M.D.  
Markham J. Fischer, M.D.  
Frederick C. Gramith, M.D.  
Joseph L. Kovar, M.D.  
Stefan D. Laxdal, M.D.  
Richard M. Levey, M.D.  
Robert G. Lind, M.D.  
David L. Moody, M.D.  
Aivars Slucis, M.D.  
Richard J. Soderberg, M.D.

### CARDIOVASCULAR & INTERVENTIONAL

James E. Finstad, M.D.  
Subbarao Inampudi, M.D.  
Timothy J. Koelz, M.D.  
Philip D. Murray, M.D.  
S. Murthy Tadavarthy, M.D.

### CROSS-SECTIONAL IMAGING

Deborah L. Day, M.D.  
Eul S. Kang, M.D.  
Philippe R. L'Heureux, M.D.  
J. Milo Meland, M.D.  
Frederick R. Olson, M.D.  
Michael B. Plunkett, M.D.  
Kurt K. Scheurer, M.D.  
Peter Brian Tillotson, M.D.  
Beverly A. Trombley, M.D.  
D. Clark Tungseth, M.D.  
Nanda Yueh, M.D.

### MUSCULOSKELETAL IMAGING

Steven J. Miller, M.D.  
Christopher L. Tillotson, M.D.

### NEURORADIOLOGY

Stephen M. Fry, M.D.  
David A. Larson, M.D.  
John W. Steely, M.D.  
Douglas H. Yock, Jr., M.D.

### NEURO-INTERVENTIONAL

Mark E. Myers, M.D.  
David E. Tubman, M.D.

### NUCLEAR MEDICINE

Geoffrey Bodeau, M.D.  
Anthony M. Cook, M.D.  
Kenneth F. Preimesberger, M.D.  
Steven A. Sirt, M.D.

### EXECUTIVE DIRECTORS

Abraham C. Abbadian  
Peter R. Bartling

### MEDICAL OFFICES/SERVICES

Centennial Lakes MRI Ctr.  
Mpls. Heart Institute  
Medical Arts Bldg.  
Metro Medical Office Bldg.  
Northern Medical Imaging Inc.  
Phillips Eye Institute  
Professional Portable X-Ray  
Southdale Medical Bldg.

### HOSPITAL LOCATIONS

Abbott Northwestern  
Albert Lea-Naeve  
Arlington  
Baldwin, WI-Community Memorial  
Buffalo Health Onc.  
Cannon Falls-Community  
Farmington-South Suburban  
Forest Lake-District Memorial  
Glencoe  
Grantsburg, WI-Burnett Cty.  
Hastings-Regina  
Hudson, WI-Memorial Hospital  
Hutchinson  
LeSueur-MN Valley  
Little Falls-St. Gabriel's  
Monticello-Big Lake  
New Richmond, WI-Holy Family  
Northfield  
Onamia-Mille Lacs  
River Falls, WI  
Shriners for Crippled Children  
St. Peter  
Waconia-Ridgeview

September 19, 1996

Cynthia Pederson, Director  
Division of Nuclear Materials Safety  
United States Nuclear Regulatory Commission  
Region 111  
801 Warrenville Road  
Lisle, IL 60532-4351

Dear Ms. Pederson:

**RE: NRC License # 22-26060-01**

During an NRC inspection conducted on August 8, 1996, we were found to be in violation of NRC requirements by failing to have documents verifying sealed source leaks had been completed at intervals not to exceed six months. I am enclosing copies of Dr. Tom Payne's safety audits dated 5/19/94 and 11/16/94. Both audits include copies of sealed source leak tests that are included in his safety audit.

In addition, I am enclosing copies of sealed source leak tests that were conducted on the following dates:

6/29/90	12/28/90
5/1/91	11/20/91
5/6/92	11/20/92
5/21/93	11/26/93
5/19/94	11/16/94
5/8/95	11/13/95
5/15/96	

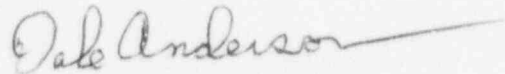
I believe that we are in compliance with the NRC regulation 35.59(b).

9701290054 960919  
PDR ADOCK 03031563  
C PDR

SEP 21 1996

We are willing to make any corrections to comply with 35.59(b), but I am not certain where we are out of compliance. Please advise me as to what the infraction of 35.59(b) is and what further follow-up action you require.

Sincerely,

A handwritten signature in cursive script that reads "Dale Anderson". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Dale Anderson  
Clinical Services Manager  
Consulting Radiologists, Ltd.  
920 East 28th Street, Suite 240  
Minneapolis, MN 55407

DA:mo

cc: Anthony Cook, MD  
Peter R. Bartling

# MIDWEST RADIATION CONSULTANTS

Medical Physics for Therapy • Diagnostic • Nuclear Medicine

P.O. Box 26218  
St. Paul, MN 55126  
(612) 863-5171

Anthony Cook MD  
Consulting Radiologists, LTD  
920 E. 28th St. Suite 240  
Mpls, MN 55407

Sept. 16, 1996

Dear Dr. Cook,

I was recently informed of the NRC Inspection on August 8, 1996 for the CRL NRC License #22-26060-01. At that inspection, the sealed source leak test records for the period between May 19, 1994 and May 8, 1995 as well as for the period between Nov. 26, 1993 and Nov. 16, 1994 were apparently in question. In addition, this was listed as a repeat violation.

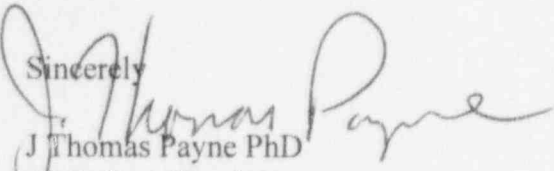
As a private consultant, I have provided Medical Physics Consultation service which included sealed source leak tests since 1990 and have sent the appropriate records to the Nuclear Medicine Supervisor. I have NEVER missed a leak test at the appropriate 6 month interval. The following is a listing of the dates where I performed a Sealed Source Leak test:

6/29/90	12/28/90	5/1/91	11/20/91	5/6/92	11/20/92	5/21/93	11/26/93
5/19/94	11/16/94	5/8/95	11/13/95	5/15/96			

Concerning the most recent NRC Notice of Violation, I provided Medical Physics Consultation on May 19, 1994 and Nov. 16, 1994 where sealed source leak tests were performed. Attached are copies of my surveys and sealed source leak test results for those dates. These reports were sent to Patricia Tenhundfeld, who would be responsible for filing these records.

Furthermore, there is NO sealed source leak test interval in excess of 6 months!! Thus, I do not understand how this has been cited as a violation for two NRC Inspections. I can only suppose that the NRC Inspector somehow did NOT find my test records at the time of inspection.

Sincerely,

  
J. Thomas Payne PhD  
ABR Cert. Physicist

**MIDWEST RADIATION CONSULTANTS, INC.**  
RADIATION THERAPY • RADIATION SAFETY • MEDICAL IMAGING

P.O. BOX 26218  
ST PAUL, MN 55126  
612/863-5171

Sealed Source Leak Test

Consulting Radiologists  
Mpls Heart Institute

Date: 5/15/96  
By: Tom Payne PhD

Std Source: Cs-137 0.1 uCi

Background 346

Std count 46985

Net Std 46639

uCi/cpm .0000021

Sealed Sources

Net Cpm

Removeable Act.

3M Cs137 1.76mCi 1/17/78  
SN 0004

42

.0001

Co57 10mCi 6/15/95  
SN S392512-03  
(Flood Source)

65

.0001

1. Removeable activity is below 0.005uCi

Yes X

2. The following sources are above 0.005uCi removeable activity.  
The following action is required:

OK  
JMF

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P.O. BOX 26218  
ST PAUL, MN 55126  
612/863-5171

Sealed Source Leak Test

Consulting Radiologists  
Mpls Heart Institute

Date: 11/13/95  
By: Tom Payne PhD

Std Source: Cs-137 0.1 uCi

Background 321

Std count 47604

Net Std 47283

uCi/cpm .0000021

Sealed Sources

Net Cpm

Removeable Act.

3M Cs137 1.76mCi 1/17/78  
SN 0004

39

.00008

Co57 10mCi 1/31/93  
SN S392353-06  
(Flood Source)

51

.0001

1. Removeable activity is below 0.005uCi

Yes X

2. The following sources are above 0.005uCi removeable activity.  
The following action is required:

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ST PAUL, MN 55126  
612/363-5171

Sealed Source Leak Test

Consulting Radiologists  
Mpls Heart Institute

Date: 5/8/95  
By: Tom Payne

Std Source: Cs-137 0.1 uCi  
Background 362  
Std count 45671  
Net Std 45309  
uCi/cpm .0000022

Sealed Sources

Net Cpm

Removeable Act.

3M Cs137 1.76mCi 1/17/78  
SN 0004

42

.0001

Co57 10mCi 1/31/93  
SN S392353-06  
(Flood Source)

37

.00008

1. Removeable activity is below 0.005uCi Yes X
2. The following sources are above 0.005uCi removeable activity.  
The following action is required:

dk  
J. V. Payne

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ST PAUL, MN 55126  
612/863-5171

Sealed Source Leak Test

Consulting Radiologists  
Mpls Heart Institute

Date: 11/16/94  
By: Tom Pyne PhD

Std Source: Cs-137 0.1 uCi

Background 332

Std count 46741

Net Std 46409

uCi/cpm .00000215

Sealed Sources

Net Cpm

Removeable Act.

3M Cs137 1.76mCi 1/17/78  
SN 0004

38

.00008

Co57 10mCi 1/31/93  
SN S392353-06  
(Flood Source)

27

.00006

1. Removeable activity is below 0.005uCi Yes X
2. The following sources are above 0.005uCi removeable activity.  
The following action is required:

de  
J. Thomas Pyne

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P.O. BOX 26218  
ST. PAUL, MINNESOTA 55126  
612/863-4060

## SEALED SOURCE LEAK TEST

Consulting Radiologists  
Mpls Heart Institute

Date: 5/19/94

Surveyor: Tom Payne PhD

Std Source Cs 137 0.1uCi  
Background 344  
Std count 47680  
Net Std 47336  
uCi/cpm .000002

Sealed Sources	Net Cpm	Removeable Act
3M Cs137 1.76mCi 1/17/78 SN 0004	<u>23</u>	<u>.00005</u>
Co57 10mCi 9/91 SN S392757-02 (Flood source)	<u>38</u>	<u>.00008</u>

1. Removeable activity is below 0.005uCi

YES

X OK

2. The following sources are above 0.005uCi; RSO requires the following action:

J. Thompson



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612/863-4060

## SEALED SOURCE LEAK TEST

Consulting Radiologists  
Mpls Heart Institute

Date: 11/26/93

Surveyor: Tom Payne PhD

Std Source Cs<sup>137</sup> 0.1 uCi  
Background 342  
Std count 48774  
Net Std 48432  
uCi/cpm .000002 uCi/cpm

Sealed Sources	Net Cpm	Removeable Act
3M Cs137 1.76mCi 1/17/78 SN 0004	<u>44</u>	<u>.00010</u>
Co57 10mCi 9/91 SN S392757-02 (Flood source)	<u>63</u>	<u>.00013</u>

1. Removeable activity is below 0.005uCi

YES

☒

*JK*

2. The following sources are above 0.005uCi; RSO requires the following action:

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612/863-4060

## SEALED SOURCE LEAK TEST

Consulting Radiologists  
Mpls Heart Institute

Date: 5/21/93

Surveyor: Tom Payne Ph.D

Std Source Cs<sup>137</sup> 0.1uCi  
Background 344  
Std count 43217  
Net Std 42873  
uCi/cpm 0.00000233

Sealed Sources	Net Cpm	Removeable Act
3M Cs137 1.76mCi 1/17/78 SN 0004	<u>27</u>	<u>0.00006</u>
Co57 10mCi 9/91 SN S392757-02 (Flood source)	<u>33</u>	<u>0.00008</u>

- ① Removeable activity is below 0.005uCi YES ✓
2. The following sources are above 0.005uCi; RSO requires the following action:

de JP

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612/863-4060

## SEALED SOURCE LEAK TEST

Consulting Radiologists  
Mpls Heart Institute

Date: 11/20/92

Surveyor: Tom Payne PhD

Std Source Cs<sup>137</sup> 0.1uCi  
Background 327  
Std count 46443  
Net Std 46116  
uCi/cpm .0000022

Sealed Sources	Net Cpm	Removeable Act
3M Cs137 1.76mCi 1/17/78 SN 0004	<u>32</u>	<u>.00007</u>
Co57 10mCi 9/91 SN S392757-02 (Flood source)	<u>47</u>	<u>.0001</u>

1. Removeable activity is below 0.005uCi

YES

X

2. The following sources are above 0.005uCi; RSO requires the following action:

*Handwritten signature and initials*  
smc.

5/6/92

SEALED SOURCE LEAK TEST

HOSPITAL Consulting Radiologists

LOCATION Mpls Heart Inst.

NRC LICENSE 22-26060-01

SOURCE(S): ① Cs<sup>137</sup> 3M 1.76 mLi 1/17/78 SN 0004  
② Co<sup>57</sup> Flood 10mLi NES 392 SN S392757-02 9/91

On 5/6/92 wet wipe(s) were used to check the surface of the sealed source(s). These wipe(s) were checked in a scintillation counter capable of detecting less than 0.005 microcuries.

BKG 303

Cs<sup>137</sup> 0.1uLi STD 44862 Net 44559

SAMPLE ① 346 43 MC .0001

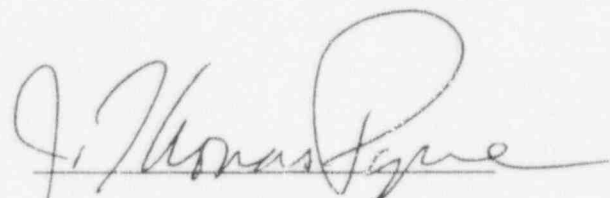
② 313 10 .00002

X

Removeable activity is less than 0.005 microcuries which is acceptable.

Removeable activity is greater than 0.005 microcuries which is NOT acceptable. Recommend the following:



J. Thomas Payne PhD  
ABR Cert. Physicist  
FACR

11/20/91

# SEALED SOURCE LEAK TEST

HOSPITAL Consulting Radiologists

LOCATION Mpls Heart Institute

NRC LICENSE 22-26060-01

SOURCE(S): ① 3M Cs-137 1.76mCi 1/17/78 SN 0004

② Co<sup>57</sup> 10mCi NES 392 (Flood) SN S392757-02

On 11/20/91 wet wipe(s) were used to check the surface of the sealed source(s). These wipe(s) were checked in a scintillation counter capable of detecting less than 0.005 microcuries.

BKG 276

Cs<sup>137</sup> 0.1mCi STD 37429 <sup>Net</sup> 37153

SAMPLE ① 271 0

② 296 20

☒ Removeable activity is less than 0.005 microcuries which is acceptable.

☐ Removeable activity is greater than 0.005 microcuries which is NOT acceptable. Recommend the following:

Anthony M. Cook MD

Thomas Payne  
Thomas Payne PhD  
ABR Cert. Physicist  
FACR

# SEALED SOURCE LEAK TEST

Consulting Radiologists  
Mpls Heart Institute

Date: 5/1/91

Surveyor: T. Payne PhD

Std Source Cs<sup>137</sup> .1uCi  
Background 273cpm  
Std count 44197 cpm  
Net Std 43924  
uCi/cpm .000022

Sealed Sources	Net Cpm	Removeable Act
3M Cs137 1.76mCi 1/17/78 SN 0004	<u>0</u>	<u>0</u>
Co57 10mCi 3/10/89 SN S322114-03 (Flood source)	<u>27</u>	<u>.00006</u>

1. Removeable activity is below 0.005uCi

YES X

2. The following sources are above 0.005uCi; RSO requires the following action:

*[Signature]*

*[Signature]*

# SEALED SOURCE LEAK TEST

Consulting Radiologists  
Mpls Heart Institute

Date: 12/28/90

Surveyor: J. Payne PNP

Std Source Cs<sup>137</sup> .12 uCi  
Background 197  
Std count 39766  
Net Std 39569  
uCi/cpm: .000003

Sealed Sources	Net Cpm	Removeable Act
3M Cs137 1.76mCi 1/17/78 SN 0004	<u>38</u>	<u>.0001</u>
Co57 10mCi 3/10/89 SN S322114-03 (Flood source)	<u>15</u>	<u>.00005</u>

1. Removeable activity is below 0.005uCi

YES

X

2. The following sources are above 0.005uCi; RSO requires the following action:

JK  
W. J. Payne

# SEALED SOURCE LEAK TEST

Consulting Radiologists  
Mpls Heart Institute

Date: 6/29/90

Surveyor: T. Payne PhD

Std Source Cs<sup>137</sup> 12uCi  
Background 223 cpm  
Std count 41629 cpm  
Net Std 41406  
uCi/cpm .0000029

Sealed Sources	Net Cpm	Removeable Act
3M Cs137 1.76mCi 1/17/78 SN 0004	<u>68</u>	<u>.0002</u>
Co57 10mCi 3/10/89 SN S322114-03 (Flood source)	<u>41</u>	<u>.0001</u>

1. Removeable activity is below 0.005uCi

YES

X

2. The following sources are above 0.005uCi; RSO requires the following action:

*[Handwritten signature]*



# NRC Radiation Safety Audit

Licensee: Consulting Radiology  
 Location: CRL - Heart Institute *ANW*  
 NRC License # 22-26060-01

Date: 11/16/94

Expir. Date: May 31  
1995

## 10 CFR Part 19

## COMMENTS:

- A. Posting Documents:  
 NRC Parts 19,20,35; License; Form 3
- B. Training:  
 In-service done/documented, all staff? ☒
- C. Exposure Reports:  
 Posted ☒ Staff informed ☒

*Users - Dr Bodine  
 Adol - Dr Sirr*

*\*Note: Maybe cost effective for removal*

## 10 CFR Part 20

- A. Highest Yr dose \_\_\_\_\_ Highest Qtr dose \_\_\_\_\_
- B. Surveys in unrestricted areas (highest level) ☒
- C. Caution Signs/Labels(OK and posted) ☒
- D. Receipt Packages: ☒  
 Promptly delivered \_\_\_\_\_ Exterior inspected \_\_\_\_\_ Survey(<100@surf., <10@1m) \_\_\_\_\_  
 Wipe test \_\_\_\_\_ Survey container b4 discard \_\_\_\_\_  
 Written procedures for receipt \_\_\_\_\_ Instructions to Supply, Security \_\_\_\_\_  
*Part of Software system*  
*Survey meter check - OK*
- E. Disposal to sewer: \_\_\_\_\_  
 Written procedures \_\_\_\_\_ Calc of Permissible \_\_\_\_\_ Log of release \_\_\_\_\_

## 10 CFR Part 35

- A. ALARA  
 Written Program ☒ Staff aware of program \_\_\_\_\_ Written ALARA audit \_\_\_\_\_
- B. Radiation Safety Officer ☒ Written Policy/Procedures for: ☒  
 1. Purchase \_\_\_\_\_ Delivery \_\_\_\_\_ Storage/Inventory \_\_\_\_\_ Emerg. Procedures \_\_\_\_\_  
 2. Quarterly surveys \_\_\_\_\_ Checks of survey instrts. \_\_\_\_\_ ALARA action levels \_\_\_\_\_  
 3. Training: NM \_\_\_\_\_ Rx \_\_\_\_\_ Nurses \_\_\_\_\_ Supply \_\_\_\_\_ Housekeep \_\_\_\_\_  
 4. System for records \_\_\_\_\_ Briefs Management(dates) \_\_\_\_\_
- C. Radiation Safety Committee ☒  
 1. Includes: NM rep., Rad. Oncology, Nurse, RSO, Mgmt., \_\_\_\_\_  
 2. Minutes include: Members present/absent, ALARA reports, Annual review, \_\_\_\_\_  
 3. Quorum equals 1/2 present \_\_\_\_\_

D. Authority and Responsibility

1. Management delegation to RSO \_\_\_\_\_
2. Written charge to RSC and RSO \_\_\_\_\_

E. Supervision / Instruction

1. Workers instructed in Rad Safety ☒
2. Audits/records ☒

F. Misadministrations

1. # in last 2 years 0 Corrective action \_\_\_\_\_

G. Dose Calibrators (all tests must be within 10% and signed by RSO)

- Daily constancy(on-call) ☒ Annual Accuracy ☒ Quarterly Linearity ☒  
 Geometry(once) ☒ *next 5/95*

H. Survey Meters ( tests within 20%)

- Yearly cal. ☒ Check source measured with each use ☒  
*next 5/95*

I. Measurement of Doses (35.53)

Records include:

- Radionuc./pharm. ☒ Lot # ☒ Expir date ☒ Patient ☒ SSN ☒  
 Prescribed dose \_\_\_\_\_ Actual dose ☒ Date/time \_\_\_\_\_ Initials ☒

J. Testing of Sealed Sources (all records signed by RSO)

- Leak test each 6 mo. ☒ Quarterly inventory ☒ Survey of Storage Area Qtrly ☒  
*Did*

K. Syringe Shields

- Available ☒ Labeled ☒

L. Survey and Wipe Tests

- Use areas daily in PM ☒ Weekly wipes ☒ Initials ☒

*Survey meter check ok*

- M. Release of Patients with Activity  
 Number of patients \_\_\_\_\_ Survey or calc. prior to release \_\_\_\_\_
- N. Decay in Storage (Waste)  
 Segregated by T1/2 \_\_\_\_\_ Stored 10 T1/2 \_\_\_\_\_ Recorded \_\_\_\_\_ Initials \_\_\_\_\_
- O. Control of Gases  
 Studies/wk \_\_\_\_\_ Act./pt \_\_\_\_\_ Vent. rate(ft<sup>3</sup>/min) \_\_\_\_\_ Vent. (hr/wk) \_\_\_\_\_  
 Room at neg. pressure \_\_\_\_\_ Xe trap \_\_\_\_\_ Calc in unrestricted area \_\_\_\_\_  
 Calc of spill clearance time \_\_\_\_\_ Spill time posted \_\_\_\_\_ Xe trap tested monthly \_\_\_\_\_  
 Vent. rates measured/6 months \_\_\_\_\_

### Safety Instruction for Therapy

1. Instruction to all persons providing care \_\_\_\_\_ Records \_\_\_\_\_
2. Procedure for RSO notification \_\_\_\_\_
3. Document removable activity < 200dpm/100cm<sup>2</sup> \_\_\_\_\_
4. Thyroid bioassay of each staff \_\_\_\_\_ *NA*

### COMMENTS:

- ① check linearity cal factors [re-did - OK]
- ② New "Constancy" Data Cal form. ✓
- ③ Did leak test ✓ *Co-57 Flood SW S 39235 3.06 ✓  
1/31/93*

### ACTION:

1. No items of noncompliance or unsafe conditions were found.
2. Please review and/or correct the following:

Radiation Physicist: \_\_\_\_\_

Radiation Safety Officer: \_\_\_\_\_

Administration: \_\_\_\_\_

Date: \_\_\_\_\_

# MIDWEST RADIATION CONSULTANTS, INC.

RADIATION THERAPY • RADIATION SAFETY • MEDICAL IMAGING

9 WEST SHORE ROAD  
ST. PAUL, MINNESOTA 55127  
612/863-4060

## Sealed Source Leak Test

Consulting Radiologists  
Mpls Heart Institute

Date: 11/16/94  
By: Tom Payne Ph.D

Std Source: Cs-137 0.1 uCi

Background 332

Std count 46741

Net Std 46409

uCi/cpm .0000215

### Sealed Sources

### Net Cpm

### Removeable Act.

3M Cs137 1.76mCi 1/17/78  
SN 0004

35 .0008

Co57 10mCi 1/31/78  
SN S392353-06

27 .0006

1. Removeable activity is below 0.005uCi Yes X
2. The following sources are above 0.005uCi removeable activity.  
The following action is required:

J. Thomas Payne

M. Release of Patients with Activity  
 Number of patients \_\_\_\_\_ Survey or calcs. prior to release \_\_\_\_\_

N. Decay in Storage (Waste)  
 Segregated by T1/2 ☒ Stored 10 T1/2 \_\_\_\_\_ Recorded \_\_\_\_\_ Initials \_\_\_\_\_

O. Control of Gases *N/A*  
 Studies/wk \_\_\_\_\_ Act./pt \_\_\_\_\_ Vent. rate (ft<sup>3</sup>/min) \_\_\_\_\_ Vent. (hr/wk) \_\_\_\_\_  
 Room at neg. pressure \_\_\_\_\_ Xe trap \_\_\_\_\_ Calc in unrestricted area \_\_\_\_\_  
 Calc of spill clearance time \_\_\_\_\_ Spill time posted \_\_\_\_\_ Xe trap tested monthly \_\_\_\_\_  
 Vent. rates measured/6 months \_\_\_\_\_

### Safety Instruction for Therapy

1. Instruction to all persons providing care ☒ Records ☒
2. Procedure for RSO notification ☒
3. Document removable activity < 200dpm/100cm<sup>2</sup> ☒
4. Thyroid bioassay of each staff ☒

### COMMENTS:

- (1) Leak test did
- (2) DC Accuracy
- (3) Survey meter - *cal.*

### ACTION:

1. No items of noncompliance or unsafe conditions were found.
2. Please review and/or correct the following:

Radiation Physicist: *Jan Payne*

Radiation Safety Officer: \_\_\_\_\_

Administration: \_\_\_\_\_

Date: \_\_\_\_\_