

August 8, 1996

[REDACTED]  
Dear [REDACTED]

I am writing to respond to your concerns about Advanced Medical Systems, Inc. (AMS) which you expressed to Mr. Michael Weber of my staff on July 8, 1996. The concerns may be summarized as follows: [REDACTED]

Per 10 CFR 30.33, an application for a specific license will be approved only if the applicant is qualified by training and experience to use the material for the purpose requested in such manner as to protect health and minimize danger to life or property. To this end, licensees are required to have a Radiation Safety Officer (RSO) who will: (1) be responsible for oversight of the day-to-day radiation protection program, (2) communicate with senior management regarding program implementation and compliance status, and (3) be available to provide advice and assistance on radiological matters.

NRC regulations do not include specific, prescriptive requirements for RSOs at unique facilities such as AMS. However, in the case of AMS, the general qualifications for an RSO at a broad scope facility have been used in the past. Exceptions to these qualifications have been authorized, depending on the scope of licensed activities, on a case-by-case basis. These general qualifications, listed in Draft Regulatory Guide DG-0005, "Applications for Licenses of Broad Scope," Oct. 1994, page 16, are as follows:

*The RSO should have an academic degree in physical or biological science or engineering, specific training in radiation health sciences, and considerable professional experience (generally about five years) with a broad spectrum of radioactive materials. The RSO's professional experience should include the application of this training to the management and administration of a radiation safety program related to the types, quantities, and uses of the radioactive material to be used under this license. A previous background in program and staff management is also desirable.*

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Regarding Mr. Haddock, NRC carefully compared his training and experience with the above qualifications. Mr. Haddock has a bachelor's degree in health, more than five years of experience in the safe use of radioactive materials, and management experience. In addition, NRC carefully considered the scope of licensed activities at AMS. On July 16, 1996, NRC approved the July 12, 1996 license amendment request from AMS to name Mr. Haddock the RSO. This decision was made by individuals at NRC who are familiar with Mr. Haddock and the AMS facility. The amended license condition states:

*The Radiation Protection Officer for service operations described in Subitems 9.B. and 9.C. [installation, maintenance, and servicing of teletherapy and radiography units] and routine health physics activities is Stephen J. Haddock.*

*The licensee shall not perform service operations described in Subitems 9.B. and 9.C. until Stephen J. Haddock has completed the required training.*

Presently, the AMS license only authorizes service operations (installation, maintenance, and servicing of teletherapy and radiography units) and routine health physics activities. Major projects outside the scope of the license will require additional health physics support.

Thank you for informing us of your concerns. Your cooperation with the NRC is greatly appreciated.

Sincerely,

Original Signed By

Cynthia D. Pederson, Director  
Division of Nuclear Materials Safety

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