

Advanced Medical Systems, Inc.

121 North Eagle Street • Geneva, Ohio 44041
(216)466-8005 FAX (216)466-8629

July 12, 1996

Mr. Geoffrey Wright
U. S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

RE: Advanced Medical Systems, Inc. Application to Amend
USNRC License No. 34-19089-01

Dear Mr. Wright:

This letter is in response to our July 10, 1996, telephone conversation. Regarding my July 5, 1996, letter requesting amendment of the referenced license to include Mr. Stephen J. Haddock as Alternate Radiation Safety Officer (ARSO), enclosed is a check for \$680.00 to cover the amendment application fees. Immediately upon your approval of this application, Mr. Haddock will serve as ARSO and will assume the responsibilities of the Advanced Medical Systems, Inc. (AMS) Radiation Safety Officer (RSO) in his absence.

As you are already aware, the current RSO, Mr. Robert Meschter, has informed us of his intention to retire from the health physics profession as soon as a replacement RSO has been identified. Upon Mr. Meschter's departure, AMS will petition the USNRC for the following changes in its radiation protection organization:

Radiation Safety Officer

The Radiation Safety Officer (RSO) for AMS is Mr. Stephen J. Haddock. Mr. Haddock who will replace Mr. Robert Meschter, has an academic degree, management experience, and over five (5) years of experience in the safe use of radioactive materials. He also has specific training in radiation protection issues, including, but not limited to:

- Principles and practices of radiation protection; Radioactivity measurements monitoring techniques, and the use of instruments;
- Mathematics and calculations basic to the use and measurement of radioactivity; biological effects of radiation;
- Safety practices applicable to protection from the radiation, chemical toxicity, and other properties of the radioactive materials in use at AMS facilities;
- Conducting radiological surveys and evaluating results; evaluating radioactive material processing facilities for proper operations from a radiological safety standpoint; and

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- Applicable USNRC, USEPA, and OSHA regulations, as well as the terms and conditions of any licenses and permits issued to AMS by these agencies.

Mr. Haddock is enrolled in the September 16-20, 1996, session of the 40-hour Radiation Safety Officer course that has been presented by CSI (Bethesda, Maryland) for 13 years. This course uses a combination of lecture, hands-on laboratory exercises, and extensive reference materials. Some of the topics included are: radiation fundamentals, radiation measurements, radiation risks, radiation risk communication (based on the Myers-Briggs Type Indicator), radiation protection standards, internal and external dosimetry radiation statistics, quality assurance, radiation surveys and personnel monitoring, record keeping, transportation of radioactive materials, radioactive and mixed waste management, waste minimization, emergency response, radioactive materials licensing, and radiation safety program management. The course is taught by Certified Health Physicists, and has been approved for continuing education units by the American Board of Health Physics and the American Board of Industrial Hygiene.

As a long-standing employee of AMS with hands-on experience in all current operations, Mr. Haddock is also knowledgeable of the origins of radiation exposures at the facility by location, operation, and job category, and has managed a number of the routine, but also the more involved radiological operations that have occurred at the facility. For example:

- Mr. Haddock was responsible for the 1991-1992 HEPA Project, which included the Hot Cell and Lab HEPA filter change out, decontamination of the room (leader on a two-man entry), and internal/external exposure monitoring.
- Mr. Haddock performed the 1992-1993 source inventory, which included reclamation of the Hot Cell (e.g., remote decontamination, waste removal, packaging of cell waste, removing tools, screening of debris for pellets, removal of items from Hot Cell to shielded drums, and remote wipe-down of the Hot Cell.) Hot Cell entries were required. During this project, Mr. Haddock removed more than 180 sealed sources from the Source Garden and cell plug using the Transfer Monster and performed a visual inspection of each.
- Mr. Haddock participated in the 1993-1994 pilot study for the Hot Cell plug removal. During this project, he operated the Hot Cell, consulted with the contractor regarding Hot Cell capabilities, assisted in repair of a hoist, and made Hot Cell entries.

- Mr. Haddock was a key participant in the 1994-1995 water treatment and sewer remediation project. He facilitated the work of the water treatment contractor, served as escort for entries into restricted areas, and interacted with contractors, regulatory authorities, and visitors.
- In 1996, Mr. Haddock assisted in performing field service for AMS teletherapy units located in Guatemala and India. During these activities, he was responsible for work area preparation, personnel exposure monitoring, equipment use, and project supervision.
- As a health physics technician at AMS, Mr. Haddock has been responsible for the performance of all routine survey activities, receipt/shipping of sealed sources, deployment and tracking of personnel dosimeters, escorting visitors and contractors into and out of restricted areas, area posting, review/approval of Radiation Safety Procedures, generating Radiation Work Permits, packaging radioactive waste, calibration of sealed sources, and inspections of the facility.

A copy of Mr. Haddock's resume is included herein as Attachment 1.

Mr. Haddock has been given the authority to implement the AMS radiation protection program described in the reference license and in RSP-001, "Radiation Protection Program Plan" in the absence of the RSO. (RSP-001 accompanied our October 31, 1995, license renewal application.) In his position as the RSO, Mr. Haddock will be responsible for recommending the type and quantity of staff and resources necessary for full implementation of the Radiation Protection Program Plan, and he has the responsibility and authority for terminating any work activities that do or may violate regulatory or AMS requirements for radiological protection.

Alternate Radiation Safety Officer

The Alternate Radiation Safety Officer (ARSO) for AMS will be Mr. Christopher Reed. Mr. Reed, who will replace Mr. Haddock, has over four (4) years of experience in the performance of radiation protection activities and has received training in radiation protection and occupational safety issues. A copy of Mr. Reed's resume is included herein as Attachment 2. Mr. Reed is also enrolled in the September 16-20 session of the 40-hour Radiation Safety Officer course offered by CSI.

Pursuant to RSP-006, "Training and Qualifications of Radiation Protection Personnel", Mr. Reed will perform work under the direct supervision of the RSO until such time as he meets the qualifications of the RSO as specified therein. However, Mr. Reed will be given the authority for implementing the radiation protection program described in RSP-001 for routine activities in the absence or unavailability of the RSO.

Radiation Safety Committee

Pursuant to RSP-001, the permanent members of the AMS Radiation Safety Committee (RSC) are the RSO, the ARSO, the Vice President, and a Certified Health Physicist. These positions will be held by Mr. Haddock, Mr. Reed, myself, and Ms. Carol D. Berger, CHP (Integrated Environmental Management, Inc.). A copy of my resume, and that of Ms. Berger are included herein as Attachments 3 and 4, respectively.

The primary role of the RSC is to provide oversight for the radiation protection program, and to render technical and operational assistance to the RSO. In addition, the RSC is responsible for:

- The review and approval of all elements of the radiation protection program and for assessing compliance with USNRC license requirements;
- Confirming that activities are performed safely and in a manner that will protect health and minimize hazards to life, property, and the environment;
- Monitoring compliance with Radiation Safety Procedures;
- Reviewing and approving Radiation Safety Procedures for currency and adequacy, recommending revisions as appropriate;
- Reviewing unusual incidents involving radioactive materials or radiation-producing machines and provide recommendations on how their recurrence shall be prevented; and
- Initiating safety evaluations of all proposed uses of radioactive material or radiation-producing machines.
- Reviewing and approving all Radiation Work Permits (RWP's) for non-routine operations pursuant to Radiation Safety Procedure No. RSP-012, "Control of Work".
- Insuring that any major projects of a non-routine nature (e.g. Hot Cell plus removal, decontamination efforts in high exposure rate/contamination level areas, source loading into/out of other than AMS containers/casks) are performed under the direct supervision of the RSO and with the assistance of a qualified radiation protection professional (e.g., NRRPT Registration or equivalent).

Mr. Geoffrey C. Wright

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Upon Mr. Meschter's departure, an application to amend License No. 34-19089-01 to reflect this organization will be submitted. In the meantime, however, please call me at 216/466-8005 if I can answer any questions or provide you with additional information. Your prompt attention to our July 5, 1996, amendment request and your favorable response to our organizational plans is appreciated.

Sincerely,

David Cesar/cs

DAVID CESAR

Vice President and Treasurer

DC/cs

Enclosure

cc: S. J. Haddock

C. Reed

D. A. Miller, Esq. - Stavole & Miller

C. D. Berger - IEM

M. Weber - USNRC Region III

ADVANCED MEDICAL SYSTEMS, INC. 121 NORTH EAGLE ST. GENEVA, OHIO 44041

STUB NO

OUR REF. NO.	YOUR INV. NO.	INV. DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
			AMS - USNRC License Amendment Per Letter Dated	7/12/96		680.00

CONTROL NO.	CHECK DATE
030166	07/12/96

ADVANCED MEDICAL SYSTEMS, INC.

121 NORTH EAGLE ST.
GENEVA, OHIO 44041

CHECK NO. 030166

BANK ONE, CLEVELAND, NA
Cleveland, Ohio

6-1543
410

CHECK AMOUNT

680.00*****

PAY TO THE ORDER OF
U.S. Nuclear
Regulatory Commission

TWO SIGNATURES REQUIRED IF AMOUNT IS OVER \$5,000.00

[Signature]

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ATTACHMENT 1

RESUME FOR STEPHEN J. HADDOCK

Education

*B.A. (Health), Baldwin-Wallace College (1986)
"Radioactive Material Shipping", IEM (1995)
CSI "40-Hour Radiation Safety Officer Training (September 16, 1996)*

Professional Affiliations

Health Physics Society (application submitted)

Experience and Background

Advanced Medical Systems, Inc. (1991 to present) - Isotope Handler and Radiation Protection Technician. Provides health physics support in all aspects of the facility's operation, including in high radiation areas with accessible dose rates in excess of three (3) R per hour, transfer and handling of radiation sources, equipment maintenance and calibration, packaging and shipping of radioactive materials, radioactive materials inventory, surveillance activities, and procedure implementation.

Coyne-Kangesser - Facility Coordinator. Managed 15 employees, which involved hiring, payroll, termination, and scheduling of personnel as well as marketing functions. Responsible for customer complaints, billing, and deposits. Position included customer contact.

Baldwin-Wallace College - Athletic Trainer. Part-time student athletic trainer with the Athletics Department. Duties included all facets of injury assessment, including emergency procedures, first-aid, including physical therapy and preventative procedures. Assisted doctors with field emergencies and physicals.

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ATTACHMENT 2

RESUME FOR CHRISTOPHER REED

Education

Health Physics Certificate, Auburn Career Center (1993)
"Radioactive Material Handling", IEM (1995)
CSI "Radiation Safety Officer 40-Hour Course (September 16-20, 1996)
29 CFR 1910.120 "Hazardous Material Training" (through October, 1996)
Machine Trades Certificate, Auburn Career Center (1992)

Experience and Background

Advanced Medical Systems, Inc. (1991 to present) - Radiation Protection Technician. Performs contamination and ambient gamma surveys; gamma spectroscopy on a variety of environmental matrices, teletherapy source handling, foreign field service, procedure implementation, equipment maintenance and calibration, decontamination activities, and inventories of radioactive materials.

Centerior Energy, Perry Nuclear Power Plant (1993-1994) - Health Physics Technician. Performed radiation and contamination surveys, instrument repair/calibration, whole body counting operations, respiratory repair and fit test, personnel/area/equipment decontamination, and job-specific health physics support.

Sears Service Center (1991 to 1993) - Lead Receiver/Shipper. Performed troubleshooting of lost inventory, processing of inbound and outbound shipments, forklift operations, bill reconciliation, and building maintenance.

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ATTACHMENT 3

RESUME FOR DAVID CESAR

Education

Bachelor of Business Administration (Accounting), Cleveland State University

Registrations/Certifications

Certified Public Accountant

Professional Affiliations

American Institute of Certified Public Accountants

Ohio Society of Certified Public Accountants

Experience and Background

Five years of public accounting experience specializing in auditing and tax.

Nine years of industry management experience as treasurer and member of board of directors for seven (7) corporations.

Trustee of two retirement plans.

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ATTACHMENT 4

RESUME FOR CAROL D. BERGER

Education

M.S., Health Physics, San Diego State University, San Diego, California; 1979
M.S., Radiation Physics, San Diego State University, San Diego, California; 1977
B.S., Physics/Chemistry, San Diego State University, San Diego, California; 1972

Registrations/Certifications

Certified Health Physicist (Comprehensive), American Board of Health Physics: 1983
Re-certified: 1987, 1991, 1995

Professional Affiliations

American Academy of Health Physics (President, 1995; Executive Committee, 1994-1996)
Health Physics Society (1977 to present)
East Tennessee Chapter - Health Physics Society (President, 1986; President-Elect, 1985; Secretary, 1981-1982)
San Diego Chapter - Health Physics Society (Charter member)
Baltimore-Washington Chapter - Health Physics Society (Treasurer, 1993-1994)
Sigma Xi - Scientific Research Society
Advisory Council for the Purdue University School of Health Sciences; 1995 to present
American Board of Health Physics, Comprehensive Panel of Examiners; 1989-1993
ASTM Task Group E-10.04.27 "Transuranic Wound Analysis"; 1986 to present
ANSI Standards Committee (ANSI N13.41) on Multiple Badging; 1986 to present; (Chairman, PlanCc-59 Working Group, 1990 to present)
ANSI Standards Committee (ANSI N13.39) on Internal Dosimetry Programs; 1994 to present
NCRP Scientific Committee 46-10, "Assessment of Occupational Exposures from Internal Emitters, 1989 to present
DOE/LAEA Whole Body Counter Intercalibration Committee (1980-1986)
Consultant to the National Cancer Institute to Evaluate Devices and Techniques to Determine Previous Radiation Exposure under Public Law 98-54 (Award for participation presented by Oak Ridge Associated Universities; April, 1988)
Steering Committee Member, U.S. Department of Energy Task Group on the Education of Future Health Physicists; 1989 to 1991
Technical reviewer and referee for Health Physics, Nuclear Technology, and Radiation Protection Management
IT Corporation Distinguished Technical Associate; June, 1992

Experience and Background

Integrated Environmental Management, Inc. (1994 to present) - President. Provides strategic environmental management services and consulting to commercial and government clients on internal and external dosimetry, radiation protection program development and implementation, applied health physics, regulations and compliance, environmental monitoring, instrumentation, emergency response, laser safety, site decommissioning, waste management, risk assessment, training, long-range business planning and cost forecasting.

IT Corporation, Nuclear Sciences Department (1986 to 1994) - Senior Technical Consultant. Performed health physics consulting for government and commercial facilities in Internal and External Dosimetry; Radiation Monitoring; Environmental Monitoring; Instrumentation; Emergency Response and Preparedness; Site Decommissioning; Radioactive Waste Management; Radiation Risk Assessment; Training; Licensing and Regulatory Negotiations; and Non-ionizing Radiation.

Martin Marietta Energy Systems, Oak Ridge National Laboratory (1983 to 1986) - Radiation Dosimetry Group Leader. Responsible for internal and external dose assessment and programs for ORNL employees, visitors, and contractors. Experience included Internal and External Dose Assessment; Monitoring Program Design and Implementation; Instrumentation Development; Site Characterizations; Personnel Management; and Training.

Union Carbide Corporation, Oak Ridge National Laboratory (1978 to 1983) - Internal Dose Group Leader. Responsible for development of the ORNL Whole Body Counter Facility for detection and quantification of the actinides in-vivo. Experience included: Internal Dose Assessment; Monitoring Program Design and Implementation; Instrumentation Development; Special Studies; Personnel Management; and Training.

Oak Ridge Associated Universities (1978 to 1986) - Teaching Staff. Provided professional training courses and general classes in the following health physics and radiation protection areas: Internal Dose Assessment; In-vivo Monitoring and Bioassay Methodologies; and Instrumentation.

President's Commission on the Accident at Three Mile Island (1979 to 1980) - Health Physics and Dosimetry Task Group Member. Tasks included: Internal Dose Assessment from Whole Body Counting Results; Estimates of Source Term from in-plant Monitoring Systems; Atmospheric Dispersion Modeling and Population Dose Assessment; and Development of Health Physics Sequence of Events.

07/12/96



Advanced Medical Systems, Inc.

1020 London Rd
Cleveland, Ohio 44110
216-692-3270

7-15-96

To: D. Cesar

From: R. Meschter

Subject: Termination

In my June 14, 1996 letter announcing my retirement from the Health Physics profession, I stated that I would be available until December 27, 1996 or until that time a new RSO was named on the license, whichever ever occurred first. While Steve Haddock has not been officially named on the license, you have informed me that you are highly confident that he will be approved by the NRC for this duty fairly quickly. Since this is the case, I feel that my voluntary obligation as stated in the June 14th letter has been fulfilled; therefore I am no longer an employee of Advanced Medical Systems effective 0730 this date. No further compensation beyond the pay period July 1 to July 14, 1996 is due me. The time sheets for this period have been submitted to Geneva.

I have given Steve Haddock all my building keys and company ID card and requested that he notify ADT Security immediately to remove my pass code from the security system and remove my name from their call list. I have also informed Mike Weber, USNRC, via fax and Carol Berger via phone call of my status.

With regard to a "turn over" to Steve, I feel that he should already be familiar with the "routine" due to his longevity at the facility. I have informed him as to the responsibilities of being an RSO. These responsibilities are outlined and specified in all the procedures, the current license commitments, and 10CFR19 and 20 et al. Any other support Steve will need can be provided by the RSC and consultants.

Thank you,

Robert Meschter

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Advanced Medical Systems, Inc.

Fax Cover Sheet

Date 7/15/96

1020 London Road

Cleveland, Ohio 44110

(216) 692-3270

Fax (216) 692-3269

ATTN: Mike Weber

FAX NO.:

COMPANY:

FROM: Bob M

EXT.

SUBJECT:

MESSAGE

Attached is FYIDyeBOS

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