



January 28, 2022

UNITED STATES NUCLEAR REGULATORY COMMISSION
Region III, Materials Licensing Section
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: Notification of RSO Change
License No. 21-02187-01
Mercy Health Partners, d/b/a Mercy Health Muskegon

1. Please accept the attached letter of understanding regarding Delegation of Authorization for Dale Schippers for radiation safety officer responsibilities.

Sincerely,

Dale Schippers

Dale Schippers, M.S., DABR
Diagnostic Medical Physicist
Mercy Health Muskegon

Attachments:

RSO Delegation of Authority for Dale Schippers.pdf

General Campus

1700 Oak Avenue
Muskegon, MI 49444
231.672.2000
800.368.4125

Hackley Campus

1700 Clinton Street
Muskegon, MI 49442
231.726.3511
800.825.4677

Lakeshore Campus

72 S. State Street
Shelby, MI 49455
231.861.2156

Mercy Campus

1500 E. Sherman Boulevard
Muskegon, MI 49444
231.672.2000
800.368.4125

**RSO / EXECUTIVE MANAGEMENT
LETTER OF UNDERSTANDING**

January 20, 2022

Dale Schippers, MS, DABR
Mercy Health Partners**Re: Radiation Safety Officer / Executive Management
Letter of Understanding**

Dear Mr. Schippers:

You have been appointed the Radiation Safety Officer (RSO), of this facility for our United States Nuclear Regulatory Commission Materials License. This "Letter of Understanding" is prepared to comply with Title 10 Code of Federal Regulations (CFR) Part 35.24(b). This section of the regulations requires that you agree in writing to the following:

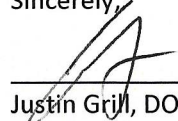
- Assume responsibility for implementing the Radiation Protection Program
- Ensure that radiation safety activities are being performed in accordance with our own approved procedures and all regulatory requirements.

Furthermore, in compliance with 10 CFR 35.24(e),(g), the executive management of this facility agrees to provide you as RSO:

- Specific written notation of your authority, duties and responsibilities, see attached.
- Sufficient authority, organizational freedom, time, resources and management prerogative to:
 1. Identify radiation safety problems;
 2. Initiate, recommend, or provide corrective actions;
 3. Stop unsafe operations; and,
 4. Verify implementation of corrective actions.

Our signatures noted below will attest to the issues noted above. Please make a copy of this document for your files and return the original to my attention.

Sincerely,



Justin Grill, DO
Vice-President and Chief Medical Officer
Mercy Health Muskegon
Executive Management



1/21/2022

Dale Schippers, MS, DABR
Radiation Safety Officer

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RADIATION SAFETY OFFICER

AUTHORITY, DUTIES AND RESPONSIBILITIES

The Radiation Safety Officer (RSO) shall:

1. Have the authority to implement the Radiation Protection Program as referenced in 10 CFR 20.1101.
2. Have the authority, organizational freedom, time, resources, and management prerogative to:
 - a. Identify radiation safety problems;
 - b. Initiate, recommend or provide corrective actions,
 - c. Stop unsafe operations; and,
 - d. Verify implementation of corrective actions.
3. Investigate deviations from the radiation safety practices approved by facility management and/or the Radiation Safety Committee, if applicable.
4. Collect in a centralized location, executive management approved procedures that can include policy and technical issues which, would makeup the Radiation Protection Program as follows:
 - a. Authorization for the purchase of radioactive material.
 - b. Receipt and opening of packages containing radioactive material.
 - c. Storage of radioactive material.
 - d. Inventory control of radioactive material.
 - e. Safe use of radioactive material.
 - f. Emergency procedures in the event of loss, theft, etc.
 - g. Periodic radiation surveys and wipe tests
 - h. Checks of radiation survey and other radiation safety instruments.
 - i. Disposal of radioactive material.
 - j. Personnel training of those who work in or frequent areas of radioactive material use or storage.
5. Oversee a record system of the Radiation Protection Program per 10 CFR 20.2102 to include at least the following:

The provisions of the Radiation Protection Program until the license is terminated by the NRC such as:

- a. All records, reports, written policies and procedures required by regulatory agencies concerning radioactive material.
- b. A copy of the regulations governing the possession, use and disposal of licensed material, such as Title 10 Code of Federal Regulations.

Audits and other reviews of the Radiation Protection Program content and implementation for a period of three (3) years after the record is made.

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6. Periodically evaluate “action levels” for continued appropriateness to ensure compliance with 10 CFR 20.1501 and 1502 for the following:
 - a. Personnel exposure investigation levels
 - b. Area surveys dose rate and contamination levels
 - c. Bioassays, if necessary
 - d. Radioactive effluent concentrations, if necessary
7. Review the following Radiation Protection Program records, if applicable:
 - a. Sealed source inventories
 - b. Sealed source leak tests
 - c. Dose calibrator linearity tests
 - d. Dose calibrator accuracy tests
 - e. Dose calibrator geometrical variation tests
 - f. Occupational radiation exposure reports
 - g. Medical event documentation
 - h. Spill / incident reports for cause and corrective action
 - i. Dose rate and contamination survey results
 - j. Changes in the radiation safety program
8. Ensure the use of reasonable practices and controls to strive to maintain doses to workers and to the public are ALARA, in compliance with 10 CFR 20.1101(b).
9. Review with facility management at least annually of the content of the Radiation Protection Program and determine if the written program is being implemented in compliance with 10 CFR 20.1101(c).
10. Ensure as a part of the ALARA effort that individual members of the public shall not receive a Total Effective Dose Equivalent (TEDE) of more than 10 mrem (0.1 mSv) per year from airborne radioactive material releases as per 10 CFR 20.1101(d) as necessary.
11. Be a member of the Radiation Safety Committee (RSC), if applicable, that will oversee all uses of byproduct material permitted by the license as per 10 CFR 35.24(f).

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Pavon, Martha

From: Gryglak, Magdalena
Sent: Monday, January 31, 2022 10:05 AM
To: Pavon, Martha; Pavon, Sandy
Cc: Tomczak, Tammy
Subject: FW: RE: [External_Sender] RE: Request to name a new RSO- NRC license no. 21-02187-01
Attachments: NRC letter referencing RSO Delegation of Authority 1-28-2022.pdf; RSO Delegation of Authority for Dale Schippers.pdf; 629493 Additional Information 665.pdf

Good morning,

Please place in ADAMS.

MG

From: Dale Schippers <Dale.Schippers@mercyhealth.com>
Sent: Friday, January 28, 2022 6:24 AM
To: Gryglak, Magdalena <Magdalena.Gryglak@nrc.gov>
Cc: Joe Haywood <haywoojr@mercyhealth.com>; Brian Dethloff <dethloffb@mercyhealth.com>
Subject: [External_Sender] RE: [External_Sender] RE: Request to name a new RSO- NRC license no. 21-02187-01

Magdalena,
Attached is our Delegation of Authority document and a letter, addressed to the NRC, referencing this delegation.

Let me know if anything else is needed.

Thanks,
Dale Schippers