



1444 Grand Avenue
Billings, MT 59102

p 406.248.9168
f 406.256.7545
vitalant.org

February 4, 2022

Dear Ms. Simmons,

As the Radiation Safety Officer for the site in Billings, Montana, I write to establish that Scott Rainey has obtained the required eight hours of hands-on training with a self-shielded irradiator.

Scott has had well over eight hours of hands-on training involved with the irradiator. I personally have done over eight hours of training with him over the years I have worked with Scott face-to-face with numerous things.

We have discussed, face-to-face, Vitalant irradiation/irradiator SOPs, safety plans, equipment, and trustworthy and reliable processes. He attended the Office of Radiological Security training in Oak Ridge, Tennessee, with me in April 2016.

Scott began operating the Shepherd Model 109C irradiator in 2001 and has had numerous face-to-face trainings with previous RSOs as well as myself. RSOs are required to perform a face-to-face annual safety review with all employees who have access to/operate the irradiator. Each training is approximately 45 minutes to one hour each year. I personally have done face-to-face annual safety training with Scott for the past four years and I have been present with him in training for numerous others conducted by previous RSOs.

Only the self-led RSO course and annual safety for the past few years are accessible through our electronic training system. Scott and I have done many hands-on trainings for the items mentioned above but they have not been documented in the electronic training system. I have gone over items with him as they come up and we often spend, on average, an hour a month discussing RSO items this past year.

Please feel free to reach out to me with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Desiree Hawkins".

Desiree Hawkins
Regional Inventory Manager
(406) 860-9575

Training and Competency Record

Center:

Irradiator Quality Control

Name: Scott Rayney

Standard Operating Procedures:

- Irradiator Quality Control, QC0001
- Task 3014 or 6016
- Task 3050

Prerequisites
Verified: SK 02/15/01

EC/Date

Check One:

- ☒ Initial
☐ Follow-Up
☐ Annual
☐ Other

Initial serves as training and competency

Training Requirements	Competency Assessment		Competent?	
	Actions	Criteria/Result	Yes	No
QC0001 Lesson Plan TED 3067L	Perform daily timer check against a calibrated stopwatch.	<ul style="list-style-type: none"> Converts time (when necessary) to minutes and seconds. Ensures time agrees ± 2 seconds. Documents on appropriate irradiator log. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Calibrate timer.	<ul style="list-style-type: none"> Starts irradiation cycle and stopwatch simultaneously. Documents elapsed time on irradiator log. Converts time (when necessary) to minutes and seconds. Calculates variance. Ensures time agrees ± 2 seconds. Takes corrective action when needed. Documents on appropriate irradiator log. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Perform leak test at least every 6 months.	<ul style="list-style-type: none"> Uses cotton swabs to wipe around drawer, irradiation chamber, and perimeter of chamber that interfaces with floor. Uses separate swab for each area. Measures swabs on appropriate instrument or sends to testing facility. Documents results on appropriate irradiator log. Takes corrective action when needed. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SK

02/15/01

Training Requirements	Competency Assessment		Competent?	
	Actions	Criteria/Result	Yes	No
	Perform Dosimetry according to schedule indicated in QC0001.	<ul style="list-style-type: none"> Performs dosimetry in water filled canister. Reviews report to ensure criteria is met for maximum and minimum dose. Takes corrective action when needed. 	✓	
				SK 02/15/01

The evaluator or trainer will conduct a Competency Assessment based on the listed actions, criteria, and applicable SOPs. To perform this task independently, the employee must demonstrate that he or she is fully "Competent" based on the listed criteria. The employee signature indicates that he or she has read, understands, and is qualified, competent and skilled to perform the tasks or procedures listed.

Steve Knutson 02-15-01
 Employee Signature/Date
Steve Knutson
 Trainer/Evaluator Signature/Date
03/29/01
 Other/Date (if applicable)

Training and Competency Record

Shepherd 109C Irradiator

Center:

Name: Scott Rainey

Standard Operating Procedures: Prerequisites:

- Shepherd 109C Irradiator Procedure, CPL0054
- Shepherd 109C Irradiator Troubleshooting and Manual Recovery, CPL0055

Task 3050

Prerequisites
Verified:

SK 02/15/01
EC/Date

Check One:

- ☒ Initial
☐ Follow-Up
☐ Annual
☐ Other

Initial serves as training and competency

Training Requirements	Competency Assessment		Competent?	
	Actions	Criteria/Result	Yes	No EC/Date
CPL0054 CPL0055 Lesson Plan TED 3092L	Perform daily canister checks.	<ul style="list-style-type: none"> Ensures canister is operating properly. Uses only acceptable canisters. Documents on Irradiator Log. 	<input checked="" type="checkbox"/>	
	Perform daily comparison of timer against calibrated stopwatch.	<ul style="list-style-type: none"> Converts time to minutes and seconds when necessary. Start cycle and time with stopwatch. Ensures time agrees within ± 2 seconds. Documents on Irradiator Log. 	<input checked="" type="checkbox"/>	SK 02/15/01
	Apply RAD-SURE™ label to component to be irradiated.	<ul style="list-style-type: none"> Verifies that the indicator expiration date has not been exceeded. Each component to be irradiated is labeled with RAD-SURE™ indicator. Documents on Irradiator Log. 	<input checked="" type="checkbox"/>	
	Irradiate components.	<ul style="list-style-type: none"> Places components in canister. Does not exceed load validation data. Begin irradiation cycle. Documents on Irradiator Log. 	<input checked="" type="checkbox"/>	
	Complete cycle.	<ul style="list-style-type: none"> Presses reset button at the end of the cycle. Open chamber and remove components. Apply appropriate product label. Ensure that RAD-SURE™ indicator is black and "NOT" has disappeared. Documents on Irradiator Log. 	<input checked="" type="checkbox"/>	

Training Requirements	Competency Assessment		Competent?		
	Actions	Criteria/Result	Yes	No	
	Complete component transformation in Progesa.	<ul style="list-style-type: none"> Component is transformed and labeled in inventory. The expiration date is changed if necessary. Documents on Irradiator Log. 			SK 02/15/01
	Troubleshoot any irradiator problems.	<ul style="list-style-type: none"> Performs troubleshooting as necessary or notifies supervisor of problems. Contacts manufacturer when needed. 	✓	✓	

The evaluator or trainer will conduct a Competency Assessment based on the listed actions, criteria, and applicable SOPs. To perform this task independently, the employee must demonstrate that he or she is fully "Competent" based on the listed criteria. The employee signature indicates that he or she has read, understands, and is qualified, competent and skilled to perform the tasks or procedures listed.

02/15/01
 Employee Signature/Date
03/29/01
 Supervisor Signature/Date

02/15/01
 Trainer/Evaluator Signature/Date

Other/Date (if applicable)



Training and Competency Record

Shepherd Irradiator Maintenance

Standard Operating Procedures:

- Shepherd 109C Irradiator Maintenance, PM0002

Prerequisites:

- Task 3014
- Task 3051 or Task 3092
- Task 3067

Prerequisites
Verified:

EC/Date
02/15/01

Check One:

- ☒ Initial
- ☐ Follow-Up
- ☐ Annual
- ☐ Other

Name:

SCOTT RALWEY

Center:

P.O. BOX 1672
BILLINGS, MT 59103

Initial serves as training and competency

Training Requirements	Competency Assessment		Competent?	
	Actions	Criteria/Result	Yes	No
PM0002 Lesson Plan TED 3074L	Perform daily checks.	<ul style="list-style-type: none">Ensures canister is operating properly.Uses only acceptable canisters.Performs timer checks.Documents on Irradiator Log.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Perform weekly compressor maintenance.	<ul style="list-style-type: none">Checks oil level.Adds oil if needed.Opens drain cock and expresses moisture from tank.Drains moisture from the moisture trap on the compressor.Documents on BS 373G.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Perform weekly irradiator maintenance.	<ul style="list-style-type: none">Inspects the water reservoir.Inspects the oil level in the glass bowl outside the irradiator.Calls for service as necessary.Documents on BS 373G.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Perform monthly maintenance.	<ul style="list-style-type: none">Wipes the irradiation chamber and the drawer below the chamber using 70% Isopropyl alcohol.Cleans Canister with alcohol.Inspects electrical connections, switches, and plugs.Corrects any problems as needed.Documents on the BS 373F.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Training Requirements	Competency Assessment		Competent?	
	Actions	Criteria/Result	Yes	No
Perform dosimetry.	<ul style="list-style-type: none"> Performs dose mapping in water filled canister. Reviews report to ensure criteria is met for maximum and minimum dose. Takes corrective action when needed. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SK 02/15/01
Schedule yearly maintenance with manufacturer's service representative.	<ul style="list-style-type: none"> Documents on the BS 373F. Maintains a copy of service performed in irradiation file or equipment file folder. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

The evaluator or trainer will conduct a Competency Assessment based on the listed actions, criteria, and applicable SOPs. To perform this task independently, the employee must demonstrate that he or she is fully "Competent" based on the listed criteria. The employee signature indicates that he or she has read, understands, and is qualified, competent and skilled to perform the tasks or procedures listed.

Greg R. [Signature] 02/15/01
Employee Signature/Date

Brenda H. [Signature] 03/29/01
Supervisor Signature/Date

[Signature] 02/15/01
Trainer/Evaluator Signature/Date

Other/Date (if applicable)

Training Record: Scott Rainey

Use the Training Record to manage all of your training.

Search Results (13)



2021 Annual Radiation Safety Awareness Program

Completed : 12/30/2021 Status : Completed



2020 Annual Radiation Safety Awareness Program

Completed : 6/14/2021 Status : Completed



2020 Annual Radiation Safety (eLearning - Part 1 of Program)

Completed : 6/14/2021 Status : Completed Equivalent



2020 Annual Radiation Safety: Site-specific discussion with RSO - Part 2 of Program (S...

Completed : 12/23/2020 Status : Completed



2019 Annual Radiation Safety Awareness Program

Completed : 12/27/2019 Status : Completed



Radiation Safety Officer (RSO) Training

Completed : 10/28/2019 Status : Completed



2018 Annual Radiation Safety Awareness Program

Completed : 12/12/2018 Status : Completed



2017 Annual Radiation Safety Awareness Program

Completed : 1/2/2018 Status : Completed



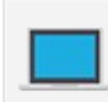
2016 Annual Radiation Safety Awareness Program

Completed : 12/21/2016 **Status :** Completed



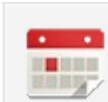
2016 Annual Radiation Safety Awareness Training (Site-specific discussion with RSO - ...

Completed : 12/16/2016 **Status :** Completed



Radiation Safety Awareness - Annual

Completed : 7/27/2015 **Status :** Completed



Radiation Safety Awareness - Annual (Starts 7/23/2015 1:00 PM)

Completed : 7/24/2015 **Status :** Completed



Radiation Safety Awareness - Annual (Starts 7/23/2015 8:00 AM)

Completed : 7/23/2015 **Status :** Completed

Model Delegation of Authority for Radiation Safety Officer

Memo To: Radiation Safety Officer

From: Chief Executive Officer

Subject: Delegation of Authority

You, Scott Rainey, have been appointed radiation safety officer and are responsible for ensuring the safe and secure use of radiation. You are responsible for managing the Radiation Protection Program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations, when justified, to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the U.S. Nuclear Regulatory Commission at any time. It is estimated that you will spend 0.50 hours per week conducting radiation protection activities.

Joseph McGlone

01/27/2022

Signature of Management Representative

Date

I accept the above responsibilities,

[Signature]

01/26/2022

Signature of Radiation Safety Officer

Date

cc: Affected department heads

From: [Rainey, Scott](#)
To: [Simmons, Michelle](#)
Cc: [Hawkins, Desiree](#)
Subject: [External_Sender] RE: Vitalant RSO Change: Additional Information is Needed
Date: Tuesday, January 25, 2022 12:47:48 PM
Attachments: [ScottRainey-Transcript-1-24-2022.pdf](#)
[Training records.pdf](#)

I confirmed with the device manufacturer that training was completed at installation. It has provided none since.

Attached are my training records for our site's self-sealed irradiator and recent radiation safety training.

Scott Rainey

Hospital Services Manager | Safety Coordinator
d 406.869.3070 | x 4413070
f 406.248.1025
Billings, MT

Because of you, life doesn't stop.
Donate blood.

From: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Sent: Monday, January 24, 2022 8:49 AM
To: Rainey, Scott <SRainey@vitalant.org>
Cc: Hawkins, Desiree <DHawkins@vitalant.org>
Subject: Vitalant RSO Change: Additional Information is Needed

CAUTION: External email. Do not open attachments, click links, or reply to unknown senders.

Good morning,

This email is in reference to your request to change the RSO on your license to Scott Rainey. In order to continue our review, we need some additional information.

1. Please provide documentation that the proposed RSO has completed the following:
 - an irradiator manufacturer's or distributor's course for users
 - at least 8 hours of hands-on experience with a self-shielded irradiator
2. Please submit a copy of the Delegation of Authority for the proposed Radiation Safety Officer. For your convenience, I have attached a "model" delegation of authority letter to this email.

Please submit the required information by January 31, 2022. Please include a cover letter on letterhead. The letter should be signed and dated by a member of upper management. If you have any questions, please feel free to contact me at the number below or by email.

Thank you

Michelle R. Simmons

(Pronouns: she, her, hers)

Senior Health Physicist

Nuclear Regulatory Commission

Materials Licensing and Decommissioning Branch

Region IV

1600 East Lamar Blvd.

Arlington, Texas 76011

817-200-1590

From: [Hawkins, Desiree](#)
To: [Simmons, Michelle](#); [Rainey, Scott](#)
Subject: [External_Sender] RE: RE: RE: Vitalant RSO Change: Additional Information is Needed
Date: Friday, February 04, 2022 6:34:56 PM
Attachments: [image001.png](#)
[20220204141334149.pdf](#)

Hi Michelle,
Here is the signed letter in pdf format.
Thank you for your help!

Desiree Hawkins

Regional Inventory Manager
c 406.860.9575



From: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Sent: Friday, February 04, 2022 7:17 AM
To: Hawkins, Desiree <DHawkins@vitalant.org>; Rainey, Scott <SRainey@vitalant.org>
Subject: RE: RE: RE: Vitalant RSO Change: Additional Information is Needed

CAUTION: External email. Do not open attachments, click links, or reply to unknown senders.

Hi Desiree,

The letter has to be signed and dated and in the pdf format.

Thanks

From: Hawkins, Desiree <DHawkins@vitalant.org>
Sent: Thursday, February 03, 2022 4:57 PM
To: Simmons, Michelle <Michelle.Simmons@nrc.gov>; Rainey, Scott <SRainey@vitalant.org>
Subject: [External_Sender] RE: RE: Vitalant RSO Change: Additional Information is Needed

Hi Michelle,
I have attached a letter detailing some of the training for Scott Rainey.
Let me know if there are any concerns.

Thank you,

Desiree Hawkins

Regional Inventory Manager
c 406.860.9575



From: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Sent: Tuesday, January 25, 2022 12:10 PM
To: Rainey, Scott <SRainey@vitalant.org>
Cc: Hawkins, Desiree <DHawkins@vitalant.org>
Subject: RE: RE: Vitalant RSO Change: Additional Information is Needed

CAUTION: External email. Do not open attachments, click links, or reply to unknown senders.

Thanks for the prompt response. I will have to consult with my supervisor to determine if the training you completed in 2001 is acceptable. Also, I need documentation demonstrating your 8 hours of "hands-on" training. Online training is not considered "hands-on." Do you have any documentation of "hands-on" training? If not, can someone provide eight hours of "hands-on" training to you?

Thanks

Michelle R. Simmons
(Pronouns: she, her, hers)
Senior Health Physicist
Nuclear Regulatory Commission
Materials Licensing and Decommissioning Branch
Region IV
1600 East Lamar Blvd.
Arlington, Texas 76011
817-200-1590

From: Rainey, Scott <SRainey@vitalant.org>
Sent: Tuesday, January 25, 2022 12:47 PM
To: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Cc: Hawkins, Desiree <DHawkins@vitalant.org>
Subject: [External_Sender] RE: Vitalant RSO Change: Additional Information is Needed

I confirmed with the device manufacturer that training was completed at installation. It has provided none since.

Attached are my training records for our site's self-sealed irradiator and recent radiation safety training.

Scott Rainey
Hospital Services Manager | Safety Coordinator
d 406.869.3070 | x 4413070
f 406.248.1025
Billings, MT

Because of you, life doesn't stop.
Donate blood.

From: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Sent: Monday, January 24, 2022 8:49 AM
To: Rainey, Scott <SRainey@vitalant.org>
Cc: Hawkins, Desiree <DHawkins@vitalant.org>
Subject: Vitalant RSO Change: Additional Information is Needed

CAUTION: External email. Do not open attachments, click links, or reply to unknown senders.

Good morning,

This email is in reference to your request to change the RSO on your license to Scott Rainey. In order to continue our review, we need some additional information.

1. Please provide documentation that the proposed RSO has completed the following:
 - an irradiator manufacturer's or distributor's course for users
 - at least 8 hours of hands-on experience with a self-shielded irradiator
2. Please submit a copy of the Delegation of Authority for the proposed Radiation Safety Officer. For your convenience, I have attached a "model" delegation of authority letter to this email.

Please submit the required information by January 31, 2022. Please include a cover letter on letterhead. The letter should be signed and dated by a member of upper management. If you have any questions, please feel free to contact me at the number below or by email.

Thank you

Michelle R. Simmons
(Pronouns: she, her, hers)
Senior Health Physicist
Nuclear Regulatory Commission
Materials Licensing and Decommissioning Branch
Region IV
1600 East Lamar Blvd.
Arlington, Texas 76011
817-200-1590