

**From:** Dennis Lawyer  
**To:** struman@medicorassociates.com  
**Date:** Mon, Mar 20, 2006 7:22 AM  
**Subject:** Medicor Associates, Inc.,RAI, RSO Information

License No.: 37-30550-01  
Docket No: 03035303  
Control No: 138475

Dear Mr. Scott Truman,

This is in reference to Dr. Charles Furr's letter dated February 15, 2006, requesting for a change in the Radiation Safety Officer. In order to continue our review, we need the following additional information:

1) Your request did not demonstrate that Mr. Truman had Radiation Dosimetry as part of a structured education program. Per 10 CFR 35.50(b)(i)(E), Radiation dosimetry is to be included in the structured educational program.

2) There was no information associated with Mr. Truman continuing training. Per 10 CFR 35.59, the applicant must have been obtained within the 7 years preceding the date of application or the individual must have had related continuing education and experience since the required training and experience was completed. This training can be on the job training. Please submit any related continuing training.

3) The written attestation statement from the preceptor RSO was missing some key required elements. It is recommended to use NRC form 313A <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc313a.pdf> when documenting training for a medical position. The written attestation statement must include the following information:

a) That the individual has satisfactorily completed the training requirements as written in the section of 10 CFR 35.50 which applies.

(In this case section (b)(1):

(b)(1) Has completed a structured educational program consisting of both:

(i) 200 hours of classroom and laboratory training in the following areas--

(A) Radiation physics and instrumentation;

(B) Radiation protection;

(C) Mathematics pertaining to the use and measurement of radioactivity;

(D) Radiation biology; and

(E) Radiation dosimetry; and

(ii) One year of full-time radiation safety experience under the supervision of the individual identified as the Radiation Safety Officer on a Commission or Agreement State license or permit issued by a Commission master material licensee that authorizes similar type(s) of use(s) of byproduct material involving the following--

(A) Shipping, receiving, and performing related radiation surveys;

(B) Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides;

- (C) Securing and controlling byproduct material;
  - (D) Using administrative controls to avoid mistakes in the administration of byproduct material;
  - (E) Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures;
  - (F) Using emergency procedures to control byproduct material; and
  - (G) Disposing of byproduct material)
- b) That the individual has achieved a level of radiation safety knowledge sufficient to function independently as a Radiation Safety Officer for a medical use licensee, and
- c) has training in the radiation safety, regulatory issues, and emergency procedures for the types of use for which a licensee seeks approval.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

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