



EASTON HOSPITAL

QUALITY CARE.
RIGHT HERE.

May 4, 2006

U.S.N.R.C.
Region I
Medical Licensing Section
Nuclear Materials Safety Branch
Division of Radiation Safety and Safeguards
475 Allendale Road
King of Prussia, PA 19406

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REGION I

To whom it may concern,

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Please be advised of the following change to our N.R.C. license (#37-09938-01). We request that you amend our license accordingly.

We wish to name Mark D. Liddington as our Radiation Safety Officer (RSO). Mr. Liddington meets the requirements of 10 CFR 35.50 as he has completed a structured educational program consisting of didactic training in the areas outlined in 35.50(b)(1)(i) A through E, has more than one year of full-time radiation safety experience under the supervision of an individual identified as the Radiation Safety Officer on a Commission license and meets the requirements of 35.50 (b)(1)(ii) A through G. Please find reference letters enclosed.

Like our current RSO, Mr. Liddington is an outside consultant/contractor. An overview of his ability to adequately manage the radiation safety program follows.

- **Regarding the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.**

We have delegated Mr. Liddington the duties and responsibilities of the Radiation Safety Officer as stated in 10 CFR 35.24 and as outlined in NUREG 1556 rev. 1 (final version).

Mr. Liddington will have authority to meet these responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified by radiation safety.

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NMSS/RONI MATERIALS-002

Mr. Liddington will be required to notify management if staff do not cooperate and do not address radiation safety issues as advised or recommended.

Mr. Liddington will have the authority to raise issues with the Nuclear Regulatory Commission at any time.

- **Explanation of the relationship that will exist between the consultant-RSO and institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.**

Mr. Liddington will communicate with institutional management on a monthly basis outlining any needs that are required to facilitate the objectives of the radiation safety program and related regulatory requirements. Also Mr. Liddington will participate in the quarterly Radiation Safety Committee meetings.

- **Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).**

Mr. Liddington's consultant contract states that he will be on site a minimum of 3 days per month which are scheduled throughout that time period. Additional times will be authorized if required to perform his duties.

Mr. Liddington is not identified as the RSO on any other commission licenses.

- **Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant RSO with limited authority.**

Charmaine Crouse will continue to be the point of contact during Mr. Liddington's absence.

- **Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires this presence.**

Mr. Liddington will be available 24 hours a day, seven days a week via a pager and/or cellular phone to respond to any questions or to address any operational issues. The consulting firm that employs Mr. Liddington has three other consultants that are also available - one of which is the RSO at two different facilities.

The maximum amount of time it will take Mr. Liddington to arrive at the facility in the event of an emergency that requires his presence is 2.0 hours.

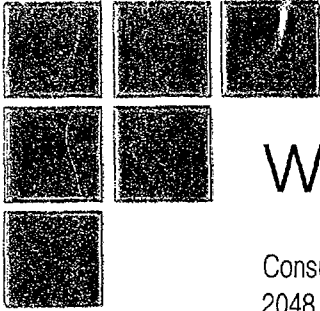
If you have any questions, please contact our Radiation Safety Officer, Walter L. Robinson at 717-291-9813.

Sincerely,

A handwritten signature in black ink, appearing to read "Cornelio Catena". The signature is fluid and cursive, with a long horizontal stroke at the end.

Cornelio Catena
President/CEO

Enclosures



Walter L. Robinson & Associates

Consultant Medical Radiation Health Physicists

2048 William Penn Way • Lancaster, PA 17601 • 717-291-9813 • 800-446-7622 Voice Mail

www.walterrobinson.com

Fax 717-295-7496

N.R.C. Region I
475 Allendale Rd.
King of Prussia, PA 119406

9-16-03

Dear to whomever it may concern,

Mark Liddington is recommended as an authorized R.S.O. by virtue of the following facts. He initially went through a radiation safety and regulatory compliance training program for at least 200 hours of radiation physics, radiation protection, Math pertaining to measurement of radioactivity, radiation biology, radiopharmaceutical chemistry, and other topics, in 1990. He has been employed by me for over 12 years as a consultant medical radiation health physicist. He has worked at several of my client jobsites in hospitals and offices. He has worked with many R.S.O.s in the course of his duties. He has headed Radiation Safety Committee Meetings, communicated with administrators and authorized users pertaining to N.R.C. and State of PA regulations applicable to nuclear medicine, nuclear cardiology, and L.D.R. brachytherapy programs. I hereby request that he be approved to be an R.S.O. for any client hospitals and offices who might need him for these duties. The scope of his R.S.O. oversight is recommended for programs licensed for 10 CFR 35.100, 200, 300, and 400 procedures. His contact time with multiple R.S.O.s at various licensed clients in PA far exceeds 1000 hours, as his duties dedicated him to over 800 hours/yr. in regulatory compliance and radiation protection duties. His totals would therefore be $800 \times 12 = >9600$ hours. I am currently the R.S.O. at St. Lukes Health Network, Easton Hospital, and Reading Cardiac Imaging Center. My associate Jack Olley was a past R.S.O. at Shamokin Community Hospital and is currently an R.S.O. at Carlisle Regional Medical Center. Mr. Liddington has approximately the same credentials as Mr. Olley.

Sincerely,

Walter L. Robinson, M.S., D.A.B.M.P., D.A.B.S.N.M., and D.A.B.R.(Eq.)

Consultant Certified Medical Radiation Health And Diagnostic Imaging Physicist



1400 Main Street
Peckville, Pennsylvania 18452
570-383-5500

October 14, 2005

Licensing Assistance Section
Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission – Region I
475 Allendale Rd.
King of Prussia, PA 19406-1415

To whom it may concern,

I'm writing in reference to Mark Liddington's ability to perform the duties of a Radiation Safety Officer.

I have worked with Mr. Liddington over the last decade and rely on his expertise to fulfill my duties as Radiation Safety Officer. Specifically, he oversees all regulatory communications, is the co-chairman of our radiation safety committee and performs all of the testing required in our radiation safety program.

Through our collaborative effort, we operate a regulatory compliant program with an inspection record containing no violations. I'm confident in his abilities to resolve radiation safety matters, his knowledge of applicable regulations and value his experience working with many licensees. I recommend that you authorize Mr. Liddington to be a Radiation Safety Officer on a U.S.N.R.C. license. He has demonstrated to me a level of responsibility necessary to fulfill the duties of a Radiation Safety Officer.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Walkowski", written over a white background.

Edward Walkowski, M.D.
Radiation Safety Officer

This is to acknowledge the receipt of your letter/application dated

5/4/2006, and to inform you that the initial processing which includes an administrative review has been performed.

Review 37-09938-01 There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 138833.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI)
(6-96)

Sincerely,
Licensing Assistance Team Leader