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July 17, 2006

Richard McKinley, Health Physicist  
Medical Branch, Div. of Nuclear Materials Safety  
Nuclear Regulatory Commission, Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415

Dear Mr. McKinley:

This letter addresses our request that Van H. McComas, M.S. be named Radiation Safety Office on our license. Since he is an outside consultant/contractor, we have enclosed answers to the questions requested in your letter dated June 19, 2006.

If you need any further information, please do not hesitate to give me a call.

Yours truly,

*Terry W. Coffey (ea)*

Terry W. Coffey  
Administrator

Enclosure

/cja

## UROLOGY

C. Ryan Barnes, M.D.  
Gary B. Bokinsky, M.D.  
Robert D. Brown, M.D.  
Joseph A. Concodora, M.D.  
Eric P. Coté, M.D.  
G. Bryan Duck, M.D.  
David B. Glazier, M.D.  
Richard W. Graham, M.D.  
Sam D. Graham, Jr., M.D.  
Isaac Koziol, M.D.  
Eugene V. Kramolowsky II, M.D.  
Douglas H. Ludeman, Jr., M.D.  
James M. McMurtry, M.D.  
Wilson C. Merchant III, M.D.  
David A. Miller, M.D.  
Mark B. Monahan, M.D.  
William R. Morgan, M.D.  
David P. Murphy, M.D.  
Kinloch Nelson, M.D.  
Robert T. Nelson, Jr., M.D.  
James E. Ratliff, M.D.  
Kent L. Rollins, M.D.  
Charles A. Seabury, M.D.  
Anthony M. Sliwinski, M.D.  
William S. Tunner, M.D.  
Wendy S. Sullivan, P.A.  
Charles E. Wadsworth, P.A.

## RADIATION ONCOLOGY

Judy L. Chin, M.D.  
John C. Chinault, M.D.  
David M. Randolph, Sr., M.D.  
George A. Trivette, M.D.  
Jo Anne D. Walker, M.D.

## PATHOLOGY

Dharam M. Ramnani, M.D.

## ANESTHESIOLOGY

Maria Antigua-Martinez, M.D.  
Margaret T. Montgomery, M.D.  
David L. Palombo, M.D.

## RADIOLOGY

Robert A. Older, M.D.

## RICHMOND LOCATIONS

Hanover Medical Park  
Monument Avenue  
Stony Point Drive  
West Broad Street

## OTHER LOCATIONS

Colonial Heights  
Emporia  
Hopewell  
Tappahannock

## ADMINISTRATION

9105 Stony Point Drive  
Richmond, Virginia 23235  
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Question: Describe 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.

Answer: Once Mr. McComas has been approved by the NRC as the RSO for this license, we will inform the staff, doctors, and authorized users, through management of his appointment by formal letter/notice. As has been our policy from the start of this program, The Radiation Safety Officer has the final word over staff, doctors, authorized users, and management when it comes to matters related to radiation safety.

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

Answer: Mr. McComas will request needed funds through the management chain starting with Kelly Wilson, RN, Surgery Coordinator, to Traci Badin, RN, Director of Surgical Services to myself. (At this point you may want to outline any other internal requirements to handle the request for funding.)

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

Answer: As a consulting medical physicist, Mr. McComas serves as the Radiation Safety Officer and Authorized Medical Physicist on NRC license # 46-25187-01, for a High Dose Rate Afterloader. As with that license, Mr. McComas is present at most of the procedures involving radioactive material at this facility. When conflicting procedures are scheduled, Mr. McComas will inform the on-site representative of his location in case his services are needed. Mr. McComas will perform most of his RSO duties during schedule implant procedures at this facility. On an average, we perform 12 prostate implants per month, averaging three per week. Mr. McComas should average about 4 hours per week on-site.

Question: 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.

Answer: Our in-house representative for the prostate seed program, who has been working with Mr. McComas for the past three years, is Deborah Long, RT (R) (N). Other than the formal training she has received as a registered radiology technologist and

nuclear medicine technologist, Debbie has had training by the medical physicist in seed handling, assay, inventory, and related radiation safety procedures. In the operating rooms besides the medical physicist, Debbie is our first line representative for radiation safety.

Question: 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 require the RSO to arrive at the facility in the event of an emergency that requires his presence.

Answer: Mr. McComas consults in the Richmond/Petersburg area and always available by cell phone. Mr. McComas performs duties as the medical physicist for our prostate seed implant program and is routinely called by our in-house representative with questions concerning seed orders or pre/post implant dosimetry. The in-house representative has several site numbers she can call if she cannot reach him by cell phone. Since Mr. McComas is in the Richmond/Petersburg area he is no longer than one hour drive time away.