



TELECOPY TRANSMITTAL

DATE: 5-30-07

TO: Jim Mallauer

Fax Number: 630-829-9873

FROM: Dawn Edwards

RE: Heart and Wellness Center, P.C.
RSO duties

COMMENTS:

Blank lines for comments

This transmittal consists of 3 pages (including transmittal cover sheet). Please contact me if you have any questions or problems with this transmittal.

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May 28, 2007

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

RE: Multiple site RSO questions

Dear Mr. Mullauer,

Currently I am an RSO at one facility, Cardiology Southwest, and am applying to be RSO at the new Heart and Wellness Institute, P.C. Both facilities are Cardiology clinics that are or will be licensed for 10 CFR 35.200 use. With the limited scope of practice and frequent communication with staff, I will be able to easily perform my duties at each facility.

The response time in the event of an emergency at the Heart and Wellness Institute, P.C. will be 20-30 minutes. The response time for Cardiology SW is approximately 1 hour 15 minutes. Both facilities have my home phone number, cell phone number and a 24 hour emergency number at Medical Physics Consultants, Inc. Once alerted of a problem I will evaluate whether I can consult over the phone or if I need to travel to the facility. Management will be immediately notified of the situation and as follow up, a written description will be forwarded to management. I will work directly with management during the situation to help identify the cause of the event and corrective action to prevent reoccurrence.

I will visit each facility a minimum of ½ day once every 3 months and can make more frequent visits if needed.

Management will have direct oversight of the day-to-day operations at this facility. Some of the daily safety duties will be delegated to the Nuclear Medicine Technologist. I will perform a radiation safety review, quarterly testing and inventories during my visits.

If you have any questions or require additional information, please contact me at 734-662-3197 or by e-mail at dedwards@mpcphysics.com

Sincerely,



Dawn M Edwards, M.S.
ABR Certified, Medical Nuclear Physics



Heart and Wellness Institute, P.C.

4 MANAGEMENT

Management as defined by the United State Regulatory Commission 10 CRF Part 35:

"Management means the chief executive officer or other individual having the authority to manage, direct, or administer the licensee's activities, or those persons' delegate or delegates."

Management shall approve in writing:

1. Requests for a license application, renewal, or amendment before submittal to the Commission.
2. Any individual before allowing that individual to work as an authorized user, authorized nuclear pharmacist authorized medical physicist.
3. Radiation protection program changes that do not require a license amendment and are permitted under 35.26

Management shall appoint a Radiation Safety Officer (RSO), who agrees in writing, to be responsible for implementing the radiation protection program. The licensee through the Radiation Safety Officer, shall ensure that radiation safety activities are being performed in accordance with licensee approved procedures and regulatory requirements.

Management must permit the RSO the following:

1. Specific written notation of authority, duties and responsibilities.
2. Sufficient 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
 - d. Verify implementation of corrective actions

(from Radiation Protection Program)