

29 August 2007

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2007 SEP - 6 AM 11: 05

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

**Re: Amendment to USNRC License # 47-25485-01 Four Seasons Nuclear Medicine, Inc. (Docket 030-35217)**

To Whom It May Concern:

Four Seasons Nuclear Medicine wishes to amend its current USNRC materials license to reflect changes in staff and program. In the near future we will be making several changes to the scope of our program. In this amendment we will attempt to outline these changes.

1. **Change in Radiation Safety Officer:** We would like to change our Radiation Safety Officer from **Nadeem G. Qazi, MD to Naeem Qazi, MD**. Dr. Naeem Qazi is an authorized user on this license for uses as described in 10 CFR 35.100 and 200. Please see the attached USNRC form 313A(rso), which is attached to this letter.
2. **Reduction in Scope of Program:** Four Seasons Nuclear Medicine wishes to reduce the scope of its program to include only materials and uses as described in 10 CFR 35.100, 200, and 500. We wish to **remove uses as describes in 10 CFR 35.300 and 31.11**. Four Seasons Nuclear Medicine has not performed any procedures requiring a written directive since February 2007. Furthermore, we have never had any spills involving materials that required a written directive and have no residual waste ( $^{131}\text{I}$ ,  $^{153}\text{Sm}$ , et cetera) from procedures requiring a written directive. We will consider, from the date of this amendment letter, our 35.300 and 31.11 program to be terminated and will possess no materials licensed under these sections of Title 10 CFR.
3. **Additional Uses for Authorized User:** We would like to have **Dr. Naeem Qazi, MD listed for uses as described in 10 CFR 35.500**. Dr. Naeem Qazi has had training from our Philips Service engineer on the use of these devices.

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4. **Remove Authorized User:** We request that **Nadeem G. Qazi, MD** be **removed** from our materials license. Dr. Nadeem Qazi is no longer practicing at Four Season Nuclear Medicine.

If you have any further questions regarding this amendment request or would like to discuss it further do not hesitate to contact me. I may be reached at (304) 323-2588.

Sincerely,

A handwritten signature in black ink, appearing to read "Naeem A. Qazi". The signature is written in a cursive style with some flourishes.

Naeem A. Qazi, MD  
President Four Seasons Nuclear Medicine

Attachments: USNRC 313A (for Naeem Qazi, MD)

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE  
AND PRECEPTOR ATTESTATION  
[10 CFR 35.50]**

APPROVED BY OMB: NO. 3150-0120  
EXPIRES: 10/31/2008

Name of Proposed Radiation Safety Officer

Naeem A. Qazi, MD

Requested Authorization(s) *The license authorizes the following medical uses (check all that apply):*

- 35.100   
  35.200   
  35.300   
  35.400   
  35.500   
  35.600 (remote afterloader)  
 35.600 (teletherapy)   
  35.600 (gamma stereotactic radiosurgery)   
  35.1000 ( \_\_\_\_\_ )

**PART I -- TRAINING AND EXPERIENCE  
(Select one of the four methods below)**

\*Training and Experience, including board certification, must have been obtained within the 7 years preceding the date of application or the individual must have obtained related continuing education and experience since the required training and experience was completed. Provide dates, duration, and description of continuing education and experience related to the uses checked above.

**1. Board Certification**

- a. Provide a copy of the board certification.
- b. Use Table 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
- c. Skip to and complete Part II Preceptor Attestation.

**OR**

**2. Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Uses Checked Above**

- a. Use the table in section 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for the additional types of medical use for which recognition as RSO is sought.
- b. Skip to and complete Part II Preceptor Attestation.

**OR**

**3. Structured Educational Program for Proposed Radiation Safety Officer**

a. Classroom and Laboratory Training

Description of Training	Location of Training	Clock Hours	Dates of Training*
Radiation physics and instrumentation			
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Chemistry of byproduct material for medical use			
Radiation biology			

**Total Hours of Training:**

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**3. Structured Educational Program for Proposed Radiation Safety Officer (continued)**

**b. Supervised Radiation Safety Experience**

*(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)*

Description of Experience	Location of Training/ License or Permit Number of Facility	Dates of Training*
Shipping, receiving, and performing related radiation surveys		
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides		
Securing and controlling byproduct material		
Using administrative controls to avoid mistakes in administration of byproduct material		
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures		
Using emergency procedures to control byproduct material		
Disposing of byproduct material		
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ _____ _____ _____		

+ Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes and quantities used: 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 remote afterloader units, 35.600 teletherapy units, 35.600 gamma stereotactic radiosurgery units, emerging technologies (provide list of devices).

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**3. Structured Educational Program for Proposed Radiation Safety Officer (continued)**

b. Supervised Radiation Safety Experience (continued)

*(If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this section.)*

Supervising Individual James P. Nunn, MS	License/Permit Number listing supervising individual as a Radiation Safety Officer 47-09207-01
This license authorizes the following medical uses:	
<input checked="" type="checkbox"/> 35.100	<input checked="" type="checkbox"/> 35.200
<input type="checkbox"/> 35.500	<input checked="" type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input checked="" type="checkbox"/> 35.300
	<input checked="" type="checkbox"/> 35.400
	<input type="checkbox"/> 35.600 (teletherapy)
	<input type="checkbox"/> 35.1000 ( _____ )

c. Describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.

Description of Training	Training Provided By	Dates of Training*
Radiation safety, regulatory issues, and emergency procedures for 35.100, 35.200, and 35.500 uses	James P. Nunn, MS Physics Associates USNRC License 45-17344-01	Feb. 2003 through June 2007
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses		
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):		





**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

**AND**

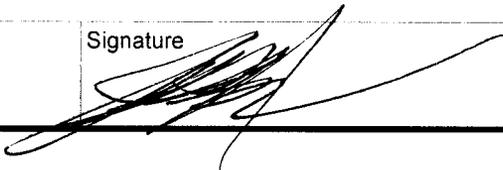
**Third Section  
Complete for ALL**

I attest that Naeem A. Qazi, MD has achieved a level of radiation safety knowledge  
Name of Proposed Radiation Safety Officer  
sufficient to function independently as a Radiation Safety Officer for a medical use licensee.

**Fourth Section  
Complete the following for Preceptor Attestation and signature**

I am the Radiation Safety Officer for Lewis-Gale Medical Center  
Name of Facility

License/Permit Number: 45-09207-01 Docket # 030-03333

Name of Preceptor	Signature	Telephone Number	Date
James P. Nunn, MS		(540) 353-2597	8/29/2007

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

8/29/2007, and to inform you that the initial processing which includes an administrative review has been performed.

AMEND. 47-25845-01  
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

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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** 141035.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.