

January 11, 2008

Materials Licensing Section  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrensville Road, Ste 210  
Lisle, IL 60532-4352  
Attn: Patricia Pelke

Re: License Amendment Application for License No. 24-00889-01

Saint Luke's Hospital of Kansas City (SLH) is requesting that your office amend its Type A License of Broad Scope to incorporate affiliated hospitals/clinics within the Saint Luke's Health System (SLHS). Specifically, we would like to incorporate Medical Plaza Imaging Associates (MPIA), License # 24-26475-01. In an attempt to standardize and provide better radiation safety services across the Saint Luke's Healthcare System, we intend to systemize policies, procedures and services under a System Radiation Safety Officer. Enclosed please find NRC Form 313, and supplemental attachments that will provide specific information regarding this program. Saint Luke's administration continues to provide its strongest backing to fulfill its materials license commitments. If you have any questions regarding this application, please contact Greg Sackett at (816) 932-6296.

Thank you for your consideration.



Kevin Thorpe  
Vice President, SLH

Enc: NRC Form 313  
Supplemental Information to NRC Form 313

RECEIVED JAN 15 2008

NRC FORM 313  
(10-2005)  
10 CFR 30, 32, 33,  
34, 35, 36, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 10/31/2008

Estimated burden per response to comply with this mandatory collection request: 4.4 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

APPLICATION FOR MATERIALS LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY  
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM  
DIVISION OF NUCLEAR MATERIALS SAFETY  
U.S. NUCLEAR REGULATORY COMMISSION, REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PA 19406-1415

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TX 76011-4005

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- A. NEW LICENSE
- B. AMENDMENT TO LICENSE NUMBER **24-00889-01**
- C. RENEWAL OF LICENSE NUMBER

2. NAME AND MAILING ADDRESS OF APPLICANT (include ZIP code)

**Saint Luke's Hospital of Kansas City**  
**4401 Wornall Road**  
**Kansas City, MO 64111**

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

**see attached**

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

**Greg Sackett**

TELEPHONE NUMBER

**(816) 932-6296**

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY AMOUNT ENCLOSED \$

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE

**Greg Sackett, RSO**

SIGNATURE

*Greg Sackett*

DATE

**1/11/08**

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		

APPROVED BY

DATE

The supplemental information provided is intended to be consistent in format and content with Appendix C of NUREG-1556, Vol. 11.

**NRC Form 313 Item 3, Additional addresses where byproduct material is currently used**

1. Medical Plaza III Building; 4321 Washington, Suite 1100; Kansas City, MO 64111
2. Saint Luke's Northland Hospital, 5830 N.W. Barry Road; Kansas City, MO 64154
3. Saint Luke's East - Lee's Summit, 100 N.E. Saint Luke's Boulevard, Lee's Summit, Missouri
4. Medical Plaza III Building, 4321 Washington, Suite 1400, Kansas City, MO 64111

**NRC Form 313 Item 5, Radioactive Material**

No change from current license.

Incorporate licensed materials use under Medical Plaza Imaging Associates license (24-26475-01), issued in accordance with letters dated January 9, 2007 and March 14, 2007 (Amendment No. 8).

**NRC Form 313 Item 6, Purpose for which licensed material will be used**

No change from current license.

**NRC Form 313 Item 7, Individuals Responsible for Radiation Safety Program and their Training Experience**

**Executive Management**

SLH is committed to ensure a safe work place for its associates, including fulfilling State and Federal requirements and meeting all Joint Commission on Accreditation of Healthcare Organization specifications. Executive management has appointed a Radiation Safety Committee (RSC) and a Radiation Safety Officer (RSO) to effectively implement the Radiation Safety Program. Delegations of Authority to the RSO have been provided by executive management.

### **Authorized Users**

Authorized Users currently listed on MPIA license (24-26475-01) shall be incorporated into a system-wide database of approved authorized users that will track authorized locations, materials and uses within the system. All authorized users are approved by the SLH Radiation Safety Committee.

### **NRC Form 313 Item 8, Training for Individuals Working in or Frequenting Restricted Areas**

No change from current license.

### **NRC Form 313 Item 9, Facilities and Equipment**

Amend to incorporate facilities and equipment (Item 9) listed in MPIA license (24-26475-01).

### **NRC Form 313 Item 10, Radiation Safety Program**

All System facilities operating under the broad scope license will follow the system radiation safety program, as provided in the Saint Luke's Hospital Radiation Safety Manual.

Regarding emergency response for various facilities under this license. Radiation Safety personnel are on-call for all facilities at any hour of the day, via wireless media (pager/cell phone). The primary location for radiation safety staff is Saint Luke's Hospital (Midtown). This location is approximately 5 minutes away from the MPIA Offices. On-site personnel are trained to deal with an emergency until Radiation Safety personnel can arrive.

### **NRC Form 313 Item 11, Waste Management**

Radioactive waste will be stored and secured in site-specific locations, and monitored by Radiation Safety staff. SLH will meet the requirements specified in 10 CFR 20 Subpart K.

**MEDICAL PLAZA IMAGING ASSOCIATES**  
**Saint Luke's Outpatient Imaging Center**


January 11, 2008

Materials Licensing Section  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrensville Road, Ste 210  
Lisle, IL 60532-4352  
Attn: Patricia Pelke

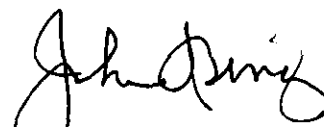
Re: Termination Notification for License No. 24-26475-01, Docket No. 030-33080

Medical Plaza Imaging Associates (MPIA) is requesting that your office terminate its radioactive materials license. MPIA is now owned by Saint Luke's Hospital of Kansas City (SLH). SLH is participating in an effort to incorporate affiliated hospitals/clinics within the Saint Luke's Health System (SLHS) radiation safety program. We therefore request that our activities be placed under Saint Luke's Hospital of Kansas City's Type A License of Broad Scope (License No. 24-00889-01, Docket No. 030-02286/030-34167). In an attempt to standardize and provide better radiation safety services across the Saint Luke's Healthcare System, we intend to systemize policies, procedures and services under a System Radiation Safety Officer. Details of this program are provided in the SLH amendment request to incorporate MPIA license activities under the broad scope license. We have enclosed NRC Form 314 to officially request this termination. Saint Luke's administration continues to provide its strongest backing to fulfill its materials license commitments. If you have any questions regarding this application, please contact Greg Sackett at (816) 932-6296.

Thank you for your consideration.



Kevin Thorpe  
Vice President, SLH



John Ising, BSRT, CRA  
Administrator, MPIA

Enclosure: NRC Form 314

### CERTIFICATE OF DISPOSITION OF MATERIALS

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0028), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE NAME AND ADDRESS

**Medical Plaza Imaging Associates**  
**4321 Washington St, Kansas City, MO 64111**

LICENSE NUMBER

**24-26475-01**

DOCKET NUMBER

**030-33080**

LICENSE EXPIRATION DATE

**04/30/2013**

This license has expired.  **A. LICENSE STATUS (Check the appropriate box)**  
 This license has not yet expired; please terminate it.

#### B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

1. No radioactive materials have ever been procured or possessed by the licensee under this license.
2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner.
  - a. Transfer of radioactive materials to the licensee listed below:

**St. Luke's Hospital of Kansas City (License No. 24-00889-01)**

b. Disposal of radioactive materials:

1. Directly by the licensee:
2. By licensed disposal site:
3. By waste contractor:

c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

#### C. SURVEYS PERFORMED AND REPORTED

1. A radiation survey was conducted by the licensee. The survey confirms:
  - a. the absence of licensed radioactive materials
  - b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
2. A copy of the radiation survey results:
  - a. is attached; or
  - b. is not attached (Provide explanation); or
  - c. was forwarded to NRC on: \_\_\_\_\_ Date
3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
  - a. The results of the latest leak test are attached; and/or
  - b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME <b>Greg Sackett</b>	TITLE <b>Radiation Safety Officer</b>	TELEPHONE (Include Area Code) <b>(816) 932-6296</b>	E-MAIL ADDRESS <b>gsackett@sah</b>
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Mail all future correspondence regarding this license to:  
**St. Luke's Hospital of Kansas City, 4401 Wornall Road, Kansas City, MO 64111**

#### C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE

**Greg Sackett, RSO**

SIGNATURE

*Greg Sackett*

DATE

**11/11/08**

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

Supplemental Information to NRC Form 314:

**NRC Form 314 Item B, Disposal of Radioactive Materials**

All activities authorized by this license are to be transferred to Saint Luke's Hospital of Kansas City's Type A Specific License of Broad Scope (# 24-00889-01, Docket # 030-02286/030-34167). Use of radioactive materials for patient care will continue uninterrupted during this transfer period.

**NRC Form 314 Item C, Surveys Performed and Reported**

Decommissioning surveys were not performed, as the authorized locations will remain in service under the broad scope license.



**Saint Luke's Hospital  
of Kansas City**

**SAINT LUKE'S HEALTH SYSTEM**

4401 Wornall Road  
Kansas City, MO 64111



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U.S. Nuclear Regulatory Commission,  
Region III  
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