

Wisconti Imaging & Vein Institute

Advanced Radiology Specialists

1114 Charlevoix Ave. • Petoskey, MI 49770 • Telephone: 231.439.9700 • Facsimile: 231.439.9709

Matthew L. Visconti, M.D.

Board Certified
American College of Radiology
Member of the
American College of Phlebology
Member of
International Spinal Injection Society

SERVICES

X-Ray

Ultrasound

OB-GYN
Vascular
3 D Fetal

MRI

MR Angiography

Breast Care

Stereotactic Biopsy
Mammography

Spine Pain Management

Facet Injections
Epidural Injection

Bone Density

Vein Treatment

Endovascular Laser
Sclerotherapy
Ambulatory Phlebectomy

Teleradiology

MRI Services provided by:
Petoskey Radiology

April 7, 2008

UNITED STATES NUCLEAR REGULATORY COMMISSION

Region III, Office of Materials Licensing
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

RE: License Application

Dear Sir/Madam:

Please find enclosed NRC Byproduct materials license application for the following location:

Wisconti Imaging & Vein Institute, P.L.L.C.
1114 Charlevoix Avenue
Petoskey, MI 49770

We have enclosed a check for \$2300.

If you have any questions or require additional information, please contact our physicist, James M. Botti at 734-662-3197 or by e-mail at jbotti@mpecphysics.com

Sincerely,



Matthew L. Visconti, M.D.
Owner

RECEIVED MAY 06 2008

**RSO / EXECUTIVE MANAGEMENT
LETTER OF UNDERSTANDING**

April 9, 2008

Michelle L. Kritzman, MS
Radiation Safety Officer
Medical Physics Consultants, Inc.
2309 Shelby Avenue.
Ann Arbor, MI 48103

Re: Radiation Safety Officer / Executive Management
Letter of Understanding

Dear Ms. Kritzman:

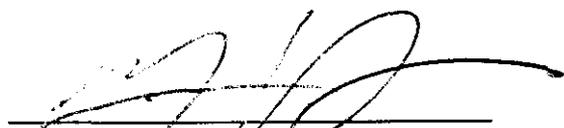
You have been appointed the Radiation Safety Officer (RSO) of this facility. This "Letter of Understanding" has been prepared to demonstrate that you willingly have accepted the duties and responsibilities of this position. I understand that my duties in this position include the following:

- Assume responsibility for implementing the Radiation Protection Program
- Ensure that radiation safety activities are being performed in accordance with our own approved procedures and all regulatory requirements.

The executive management of this facility agrees to provide you as RSO:

- Specific written notation of your authority, duties and responsibilities.
- Sufficient authority, organizational freedom, time, resources and management prerogative to:
 1. Identify radiation safety problems;
 2. Initiate, recommend, or provide corrective actions;
 3. Stop unsafe operations; and,
 4. Verify implementation of corrective actions.

Sincerely,


Executive Management
Mathew L. Visconti, MD


Radiation Safety Officer
Michelle L. Kritzman, MS



April 9, 2008

United States Nuclear Regulatory Commission
Region III, Office of Materials Licensing
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

RE: RSO Availability and Ability to Perform Duties

To Whom It May Concern:

Please find the information listed below concerning my availability and ability to perform RSO duties at this facility.

Item #1: My position at Medical Physics Consultants allows me adequate time and flexibility to address both my contractual and regulatory obligations to any facility that I am currently listed as the Radiation Safety Officer.

The position of Radiation Safety Officer is what we are contracted for by these facilities. All facilities have a signed contract by both them and Medical Physics Consultants. These contracts clearly outline both my responsibilities and the facilities. All facilities have also signed a RSO / Management Agreement form which has been forwarded to the NRC in all applications and / or amendments.

I am a board certified by the American Board of Radiology in Medical Nuclear Physics. I have over 15 years of experience in Nuclear Medicine. This is my livelihood and my occupation.

All facilities are audited on a quarterly basis which is standard of practice. These audits are forwarded to both management and the supervising technologist. These audits are reviewed and signed by both of these individuals. Any items that require attention are documented by the supervising technologist.

Please review the previous inspection history of any facility that I have been listed as the Radiation Safety Officer and you will find that I have an excellent track record with respect to compliance to NRC regulations.

2309 Shelby Avenue
Ann Arbor, MI 48103
(734) 662-9224 Fax
(734) 662-3197

70 E. 91st Street, Suite 106
Indianapolis, IN 46240
(317) 581-1931 Fax
(317) 581-1911

4806 Mile High Drive
Salt Lake City, UT 84124
(801) 272-2952 Office & Fax

N7375 Crystal Ridge Drive
Beaver Dam, WI 53916
(920) 885-9872 Fax
(920) 885-9870

www.mpcphysics.com

Item #2: The amount of time for me to respond to an emergency involving radioactive material will vary depending upon my activities that day. Typically I would be able to respond immediately by phone. Facilities have both my cell phone and office phone numbers. The office staff at Medical Physics Consultants has a copy of my daily schedule at all times. The staff has phone numbers to any location that I might be working.

Medical Physics Consultants has an answering service that operates 24 hours a day, 7 days a week, 365 days a year. They have phone numbers for my home, cell and office. If for some reason they are not able to contact me, they have a list of other physicists that are employed by Medical Physics Consultants to contact. These individuals are also board certified physicists with a great deal of expertise. This same mechanism has been in place for years whenever one of our facilities is in need of immediate expertise and advice. If we are contacted for a radiological emergency we direct the account to notify the appropriate management individual.

As stated earlier we audit the program quarterly, any unsafe practices or incidents are reported to management in writing. Items of significant concern are always reported to management verbally in addition to the written documentation.

Item #3: The amount of time that I will spend at this facility will vary. Time will depend upon the status of the Radiation Protection Program and other variables. As stated above quarterly reports are sent to management.

Item #4: All individuals who handle or have access to radioactive material are overseen by a supervisor. These supervisors reports directly to management and the Radiation Safety Officer. All individuals are in-serviced yearly. Management in their license application have committed to supplying the necessary resources for these individuals to achieve regulatory compliance. Additionally, they have committed to this in the RSO / Management Agreement letter.

If you have any questions or if I may be of assistance, please contact me by phone at (734) 662-3197 or by e-mail at mkritzman@mpcphysics.com.

Respectfully Yours,



Michelle L. Kritzman, MS
Radiological Physicist
Board Certified, ABR, ABMP

Applicability Table

8.1	License Action Type	Enclosed
8.2	Applicant's Name and Mailing Address	Enclosed
8.3	Address where Material Used or Possessed	Enclosed
8.4	Person to Be Contacted	Enclosed
8.5	Radioactive Material	Enclosed
8.6	Sealed Sources and Devices	Enclosed
8.7	Recordkeeping for Decommissioning	N/A
8.8	Purpose for which Licensed Material is Used	Enclosed
8.9	Responsibility for Radiation Safety Program	Enclosed
8.10	Radiation Safety Officer	Enclosed
8.11	Authorized Users	Enclosed
8.12	Authorized Nuclear Pharmacist	N/A
8.13	Authorized Medical Physicist	N/A
8.14	Facilities and Equipment	Enclosed
8.15	Facility Diagram	Enclosed
8.16	Radiation Monitoring Instruments	Enclosed
8.17	Equipment to Measure Dosages	Enclosed
8.18	Dosimetry Equipment Calibration and Use	N/A
8.19	Other Equipment and Facilities	N/A
8.20	Radiation Protection Program	Enclosed
8.21	Safety Procedures and Instructions	Enclosed
8.22	Occupational Dose	Enclosed
8.23	Area Survey Procedures	Enclosed
8.24	Safe Use of Unsealed Licensed Material	Enclosed
8.25	Spill Procedures	Enclosed
8.26	Therapy Devices with Sealed Sources	N/A
8.27	Minimization of Contamination	Enclosed
8.28	Waste Management	Enclosed
8.29	Fees	Enclosed
8.30	Certification	Enclosed

LICENSE ACTION TYPE

8.1 Item 1

NRC License Application

LICENSEES NAME AND MAILING ADDRESS

8.2 Item 2

Visconti Imaging and Vein Institute, P.L.L.C.
1114 Charlevoix Avenue
Petoskey, MI, 49770

ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

8.3 Item 3

Visconti Imaging and Vein Institute, P.L.L.C.
1114 Charlevoix Avenue
Petoskey, MI, 49770

PERSON TO BE CONTACTED ABOUT THIS APPLICATION

8.4 Item 4

Michelle L. Kritzman, MS
Radiological Physicist
Phone: 734-662-3197
Fax: 734-662-9224

RADIOACTIVE MATERIAL AND USE

Byproduct Material	Item 5 Amount	Item 6 Purpose
Material in 35.200	As Needed	Imaging and localization studies

RADIATION SAFETY PROGRAM RESPONSIBILITY

Item 7.1

Authorized Users	Materials
Matthew L. Visconti, M.D.	35.200

Dr. Visconti is currently listed as an authorized user on NRC license # 21-24363-01, amendment #19.

Item 7.3

Radiation Safety Officer

Michelle Kritzman, MS

Ms. Kritzman is currently listed as a RSO on NRC license # 21-24901-01

FACILITIES AND EQUIPMENT LIST

Item 9.1

Imaging Equipment

Spect Gamma Camera

Well Counters

Capintec Caprac

Dose Calibrator

Capintec Dose Calibrator

Survey Meters

Ludlum 14-C GM Survey Meter x 2

High Range (0-2000 mR/hr)

Low Range (0-0.02 mR/hr)

Other

Lead Glass Face Shields

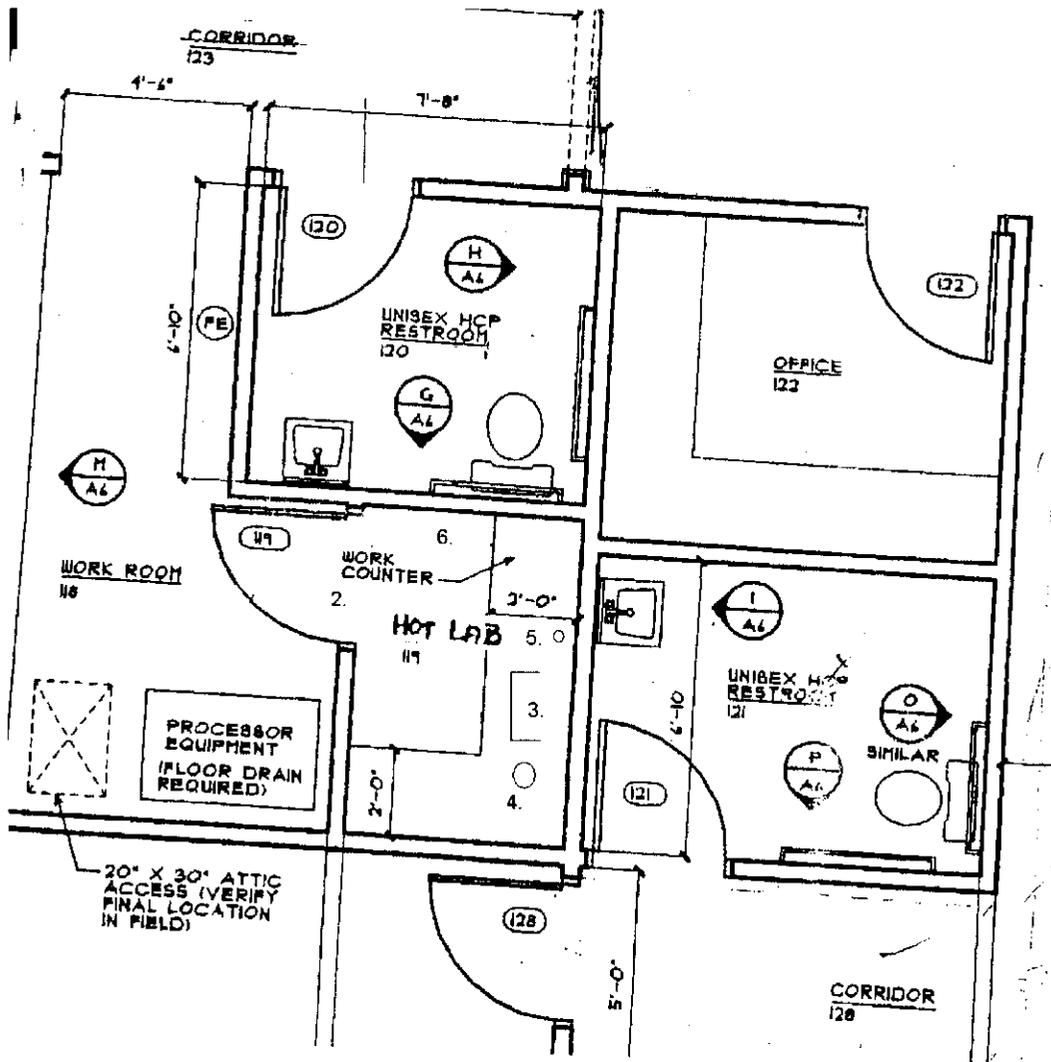
Leaded Syringe Shields

Remote Handling Tools

Lead Bricks

RadiacWash

Absorbent Pads



1. Camera
2. Locked Door
3. L-Shield
4. Dose Calibrator
5. Well Counter
6. Package Receipt

Access to all radioactive materials is secured by lock and key. Access is restricted to authorize personnel only.

This is a single story structure; therefore nothing is above the department. Directly below the department is a concrete slab.

RADIATION MONITORING INSTRUMENTS

8.16 Item 9

The licensee shall possess calibrated radiation detection and measuring instruments that will be used for radiation protection, including survey and monitoring instruments and quantitative measuring instruments needed to monitor the adequacy of radioactive materials containment and contamination control.

"Radiation monitoring instruments will be calibrated by a person qualified to perform survey meter calibrations."

1. The manufacturer:
2. Medical Physics Consultants: (NRC License # 21-20153-01)
3. Any authorized user licensed to perform survey meter calibrations as a service.
4. We reserve the right to upgrade our survey instruments as necessary as long as they are adequate to measure the type and levels of radiation for which they are used.

DOSE CALIBRATOR AND OTHER EQUIPMENT USED TO MEASURE DOSAGES OF UNSEALED BYPRODUCT MATERIAL

8.17 Item 9

Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards (e.g., ANSI) or the manufacturer's instructions.

RADIATION PROTECTION PROGRAM

8.20 Item 10

1. The RSO or delegate will promptly review all film or TLD exposure reports to look for workers or groups of workers whose reported exposures are unusual.
2. All individuals who are occupationally exposed to radiation on a regular basis will be issued a film or TLD whole body monitor.
3. All individuals who handle radioactive material on a regular basis will be issued a film or TLD finger monitor.
4. All individuals who are occupationally exposed to significant radiation levels on an occasional basis, such as nurses caring for radiopharmaceutical therapy or implant patients, will be issued a whole body monitor when caring for those patients.
5. Other individuals who are exposed to radiation on an occasional basis such as security personnel who deliver packages, secretarial personnel who work in the nuclear medicine clinic but do not work with patients, and nurses who occasionally care for patients who have received diagnostic dosages will not normally be issued exposure monitors.
6. All film and TLD badges will be changed on a monthly or quarterly basis.
7. We will use a NVLAP accredited dosimetry processor.

OCCUPATIONAL DOSE

8.22 Item 10

“Either we will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry that meets the requirements listed under “Criteria in NUREG-1556, Vol. 9, Rev 2, Consolidated Guidance about Materials Licenses: Program specific Guidance About Medical Licensees.

AREA SURVEYS

8.23 Item 10

“We have developed and will implement and maintain written procedures for area surveys in accordance with 10 CFR 20.1101 that meet the requirements of 10 CFR 20.1501 and 10 CFR 35.70”

SAFE USE OF UNSEALED LICENSED MATERIAL

8.24 Item 10

“We have developed and will implement and maintain procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1301”

SPILL PROCEDURES

8.25 Item 10

“We have developed and will implement and maintain written procedures for safe response to spills of licensed material in accordance with 10 CFR 20.1101”

MINIMIZATION OF CONTAMINATION

8.27 Item 10

WASTE MANAGEMENT

8.28 Item 11

"We have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of Subpart K to 10 CFR Part 20 and 10 CFR 35.92."

FEES

8.29 Item 12

Refer to NRC Form 313

CERTIFICATION

8.30 Item 13

Refer to NRC Form 313



Service Contract For:

Visconti Imaging & Vein Institute, PLLC

1114 Charlevoix Avenue
Petoskey, MI 49770

MEDICAL PHYSICS CONSULTANTS, INC.

Medical Physics Consultants, Inc. (hereinafter "MPC") is a Michigan-based corporation of M.S. level physicists with expertise in Radiation Safety, Nuclear Medicine and Diagnostic Radiology.

ADMINISTRATION

1. Radiation Safety Officer services will be provided (see attachment for list of duties and responsibilities of R.S.O.)
2. Assistance in assuring that the records required by the state and federal government and accreditation agencies are appropriately documented and maintained.
3. Unlimited telephone consultation (plus FAX and 24 hour emergency).

2309 Shelby Avenue
Ann Arbor, MI 48103
(734) 662-9224 Fax
(734) 662-3197

70 E. 91st Street, Suite 106
Indianapolis, IN 46240
(317) 581-1931 Fax
(317) 581-1911

4806 Mile High Drive
Salt Lake City, UT 84124
(801) 467-8774 Office & Fax

N7375 Crystal Ridge Drive
Beaver Dam, WI 53916
(920) 885-9872 Fax
(920) 885-9870

NUCLEAR MEDICINE SERVICES

MPC will provide:

1. Quarterly compliance inspections of licensed activities with typed reports and an administrative summary.
2. Evaluation of equipment including:
 - A. Scintillation cameras
 - B. Thyroid uptake systems
 - C. Well counters
 - D. Dose calibrators
 - E. Survey meters
3. Dose calibrator accuracy tests.
4. Dose calibrator linearity tests (shield method) [upon request].
5. Uptake probe/well counter resolution and reproducibility tests.
6. Radiation survey meter calibrations (NRC license 21-20153-01).
7. Radionuclide sealed source leak tests (NRC license 21-20153-01).
8. Radionuclide sealed source inventories and ambient surveys.
9. Preparation of license renewals and amendments.
10. Patient radiation dose estimate calculations per JCAHO.
11. Fetal radiation dose estimate calculations by an ABR certified Medical Nuclear Physicist.
12. Assistance upon request in the instruction of personnel as required by state, federal, and accreditation agencies if performed in conjunction with quarterly audits.
13. A review of personnel radiation exposures and preparation of over-exposure reports.
14. A review of incidents involving licensed material with respect to cause and subsequent actions taken and prepare incident reports.
15. Assistance in the preparation of misadministration/medical event reports.

ADDITIONAL SERVICES

Additional services are available at a negotiated fee including:

1. The design, calculation and inspection of radiation protection shielding.
2. Acceptance testing of PET and ECT/gamma camera and diagnostic radiological systems.
3. ACR accreditation services: CT, MRI, ECT/gamma cameras and PET systems.
4. License preparation: \$500.
5. On-site services during the pre-licensing inspection: \$1000.

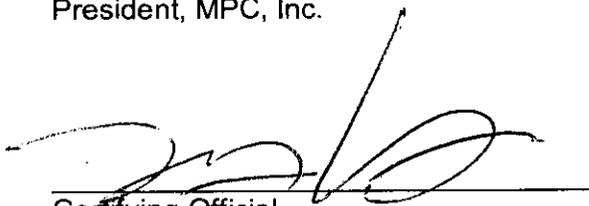
AGREEMENT TERMS

1. This service contract proposal will be valid for a period of one year, **effective quarter license is granted.** The services listed above will be automatically renewed at the end of the one year period. Rates may be adjusted after the end of the one year period.
2. A ninety (90) day written notice must be given by one party to the other party of its intent to terminate this contract.
3. **Visconti Imaging & Vein Institute, PLLC** agrees to pay MPC **\$1,000.00 per quarter** for the Administration and Nuclear Medicine services listed above (\$4,000.00 per annum).

CERTIFICATION



James E. Carey, M.S.
President, MPC, Inc.



Certifying Official
Visconti Imaging & Vein Institute, PLLC

**RADIATION SAFETY OFFICER
AUTHORITY, DUTIES AND RESPONSIBILITIES**

The Radiation Safety Officer (RSO) shall:

1. Have the authority to implement the Radiation Protection Program as referenced in 10 CFR 20.1101.
2. Have the 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; and,
 - d. Verify implementation of corrective actions.
3. Investigate deviations from the radiation safety practices approved by facility management and/or the Radiation Safety Committee, if applicable.
4. Collect in a centralized location, executive management approved procedures that can include policy and technical issues which, would makeup the Radiation Protection Program as follows:
 - a. Authorization for the purchase of radioactive material.
 - b. Receipt and opening of packages containing radioactive material.
 - c. Storage of radioactive material.
 - d. Inventory control of radioactive material.
 - e. Safe use of radioactive material.
 - f. Emergency procedures in the event of loss, theft, etc.
 - g. Periodic radiation surveys and wipe tests
 - h. Checks of radiation survey and other radiation safety instruments.
 - i. Disposal of radioactive material.
 - j. Personnel training of those who work in or frequent areas of radioactive material use or storage.
5. Oversee a record system of the Radiation Protection Program per 10 CFR 20.2102 to include at least the following:

The provisions of the Radiation Protection Program until the license is terminated by the NRC such as:

- a. All records, reports, written policies and procedures required by regulatory agencies concerning radioactive material.
- b. A copy of the regulations governing the possession, use and disposal of licensed material, such as Title 10 Code of Federal Regulations.

RSO Authority, Duties & Responsibilities

6. Periodically evaluate "action levels" for continued appropriateness to ensure compliance with 10 CFR 20.1501 and 1502 for the following:
 - a. Personnel exposure investigation levels
 - b. Area surveys, dose rate and contamination levels
 - c. Bioassays, if necessary
 - d. Radioactive effluent concentrations, if necessary
7. Review the following Radiation Protection Program records, if applicable:
 - a. Sealed source inventories
 - b. Sealed source leak tests
 - c. Dose calibrator linearity tests
 - d. Dose calibrator accuracy tests
 - e. Dose calibrator geometrical variation tests
 - f. Occupational radiation exposure reports
 - g. Medical event documentation
 - h. Spill / incident reports for cause and corrective action
 - i. Dose rate and contamination survey results
 - j. Changes in the radiation safety program
8. Ensure the use of reasonable practices and controls to strive to maintain doses to workers and to the public are ALARA, in compliance with 10 CFR 20.1101(b).
9. Review with facility management at least annually of the content of the Radiation Protection Program and determine if the written program is being implemented in compliance with 10 CFR 20.1101(c).
10. Ensure as a part of the ALARA effort that individual members of the public shall not receive a Total Effective Dose Equivalent (TEDE) of more than 10 mrem (0.1 mSv) per year from airborne radioactive material releases as per 10 CFR 20.1101(d) as necessary.
11. Be a member of the Radiation Safety Committee (RSC), if applicable, that will oversee all uses of byproduct material permitted by the license as per 10 CFR 35.24(f).

FLAT RATE POSTAGE
REGARDLESS OF WEIGHT
DOMESTIC USE ONLY

CALL 1-800-222-1811 FOR PICKUP OR TRACKING OF ALL YOUR PACKAGES

EXPRESS MAIL

UNITED STATES POSTAL SERVICE



EB 1 RECEIVED in bad

condition at:

60532

EXPRESS MAIL

UNITED STATES POSTAL SERVICE

Mailing Label
Label 11-B, March 2004

Post Office To Address: 6

Delivery Attempt	Time	AM	Employee Signature
Mo: 5	Day: 03	14:30	Closed
Delivery Attempt	Time	AM	Employee Signature
Mo: Day	Time	AM	Employee Signature
Delivery Date	Time	AM	Employee Signature
Mo: Day	Time	AM	Employee Signature

CUSTOMER USE ONLY

PAYMENT BY ACCOUNT
Express Mail Corporate Acct. No.

Federal Agency Acct. No. or Postal Service Acct. No.

PO ZIP Code	Day of Delivery	Postage
49770	<input type="checkbox"/> Next <input type="checkbox"/> 2nd <input type="checkbox"/> 3rd Del. Day	\$ 16.25
Date Accepted	Scheduled Date of Delivery	Return Receipt Fee
Mo: 5 Day: 2 Year: 08	Month: 5 Day: 5	\$
Time Accepted	Scheduled Time of Delivery	COD Fee
5:05 <input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> Noon <input checked="" type="checkbox"/> 1:30 PM	\$
Flat Rate <input type="checkbox"/> or Weight	Military <input type="checkbox"/>	Insurance Fee
8.3 lbs.	<input type="checkbox"/> 2nd Day <input type="checkbox"/> 3rd Day	\$ 16.28
Int'l Alpha Country Code	Acceptance Emp. Initials	00

FROM: (PLEASE PRINT) PHONE: 231.439-9700

Visconti Imaging + Vein Institute
1114 Charlevoix Ave
PETOSKEY, Mich 49770

TO: (PLEASE PRINT) PHONE:

United States Nuclear Regulatory Commission
Region III, Office of Materials Licensing
2443 Warrenville Rd
Ste 210
Lisle, Illinois

ZIP + 4 (U.S. ADDRESSES ONLY. DO NOT USE FOR FOREIGN POSTAL CODES.)

60522 + 4352

FOR INTERNATIONAL DESTINATIONS, WRITE COUNTRY NAME BELOW.

RECEIVED in bad
condition at 60532

21

This packaging is the property of the U.S. Postal Service and is provided solely for use in sending Express Mail. Misuse may be a violation of federal law.