From: Elizabeth Ullrich
Sent: Thursday, July 17, 2008 3:10 PM
To: Chelsey Collier
Subject: your July 9 response to the NRC

License No. 06-31314-01
Docket No. 030-37776
Control No. 142479
SUBJECT: APPLICATION FOR A NEW LICENSE, HARTFORD CARDIOLOGY

Chelsey,

We received the July 9, 2008 re-submittal of the license application, and all of the information is acceptable except for the information needed to approve Dr. Knox as the Radiation Safety Officer (RSO).

Basically, there are 4 different ways that he could qualify to be an RSO. Using the outline from NRC Form 313A (RSO), I will go through what he submitted and let you know what is missing. I will also annotate with the regulatory reference.
Here is the link to the applicable regulation, 10 CFR 35.50:
http://www.nrc.gov/reading-rm/doc-collections/cfr/part035/part035-0050.html

Here is the link to Form 313A (RSO):
http://www.nrc.gov/reading-rm/doc-collections/forms/nrc313a(rso).pdf

Part I of 313A (RSO)
Option 1. Board Certification - a person who wants to be an RSO may submit 1- a copy of the Board certification AND fill out the table in Section 3.c AND provide the Preceptor Attestation in Part II. This is in accordance with 10 CFR 35.50(a). Dr. Knox did not choose this option.

OR
Option 2. a person who is an RSO for certain uses on the license wants to be RSO for other additional uses. (10 CFR 35.50(c](2) This is not applicable to Dr. Knox.

OR
Option 3. Structured Educational Program for Proposed Radiation Safety Officer. This requires the proposed applicant to fill out Part 3.a. document the minimum 200 hours of classroom and laboratory training [10 CFR 35.50(b)(1)(i)] AND Part 3.b. the supervised one full year of radiation safety work experience [document the 7 experience areas, showing the location/license number and dates of that work experience; this section continues to the top of the following page and requires the name of the supervising individual who is an RSO and the license number under which the supervising individual is named as an RSO and the medical uses for which the supervising user is an RSO][10 CFR 35.50(b)(1)(ii)] AND Part 3.c documenting that the proposed RSO has been provided training specific to the medical uses for which he wishes to be named RSO, provided by a supervising RSO and listing the license number on which the supervising RSO is listed as an RSO [10 CFR 35.50(e)] AND the Part II - Preceptor Attestation must be filled out by the preceptor RSO.

Dr. Knox appeared to select this third option.
He checked Box 3.

He filled in Table 3.a.
He did not fill in Table 3.b and did not name the supervising RSO and the license number under which work experience was gained. We must have this information in order to name him RSO under this option.
He did fill out table 3.c but he did not name the supervising RSO and the license number under which the 3.c training was obtained. We must have this information in order to name him RSO under this option.
He did not provide the Part II - Preceptor Attestation.

OR
Option 4 - the person to be named RSO is already named as an Authorized User on the same license [10 CFR 35.50(c)(2)…this is not applicable in this case.

ALL of the above options require that the "Part II - Preceptor Attestation" be provided. This is required to be signed by each preceptor to cover the areas that each is attesting to. there are four sections to the Part II Preceptor Attestation. the first Section documents that the preceptor is attesting that the individual to be named RSO has completed the applicable training requirements; the Second Section confirms the preceptors understanding of the medical uses for which the proposed RSO has had training; the Third Section attests to the preceptor's opinion that the proposed RSO has sufficient radiation safety knowledge to be an RSO for the purposes required; and the Fourth Section states the preceptor's facility and license number under which the preceptor is named as RSO. The bottom of the page needs to be signed by the preceptor and provide the other requested information.

However, the preceptor attestation provided with the application is not complete: The first section does not check the Option for qualification to which the preceptor is attesting; the middle page of the preceptor attestation (page 5 of NRC Form 313A (RSO) containing the third section is missing; the fourth section is not filled out by the preceptor; and Dr. Knox signed the bottom of the form instead of the preceptor.

If Dr. Knox does not yet have sufficient experience to be named as the Radiation Safety Officer, another individual may be named who does meet the current criteria. If another individual is named as the RSO for this license, Dr. Knox could gain the supervised work experience under that individual and re-apply to be named RSO on the license at a future date.

If another individual is proposed to be the RSO who is not a full-time employee of this practise, the following information should be provided:

a. 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.

b. 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.

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

d. 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.

e. 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 take the RSO to arrive at the facility in the event of an emergency that requires his presence.

Please provide a hard copy, signed response either presenting the additional information needed to approve Dr. Knox as the Radiation Safety Officer for this license; or the Form 313A (RSO) information required to propose a different individual as Radiation Safety Officer for this license.

thanks,
Betsy

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E-mail Properties

Mail Envelope Properties ()

Subject: your July 9 response to the NRC
Sent Date: 07/17/2008 1:36:25 PM
Received Date: 07/17/2008 3:09:00 PM
From: Elizabeth Ullrich

Created By: Elizabeth.Ullrich@nrc.gov

Recipients:
cec.hcg@sbcglobal.net (Chelsey Collier)
Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	18724	07/17/2008

Options
Expiration Date:
Priority: olImportanceNormal
ReplyRequested: False
Return Notification: False

Sensitivity: olNormal
Recipients received: