



MARION GENERAL HOSPITAL

December 15, 2008

U.S. Nuclear Regulatory Commission
Materials Licensing Section
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Dear Sir or Madam:

Marion General Hospital, NRC Byproduct Materials License Number 13-17956-01, would like list Richard Sanchez, M.D. as the Radiation Safety Officer. Dr. Sanchez is currently listed as an Authorized User on our license and we have enclosed the appropriate Form 313A as well as a memo signed by both management and Dr. Sanchez. Please note that we wish to retain the current RSO, Dr. Bruns, as an Authorized User on the license.

Also, we would like to modify the current Hot Lab at the 441 North Wabash Avenue address of use. Specifically, we would like to make the current Hot Lab into two rooms, one to continue to be utilized as a Hot Lab, the other to be a non-restricted room. A diagram of the proposed setup is enclosed, titled Attachment 9.1. In addition, a close-out survey of the portion of the Hot Lab that is to be non-restricted is enclosed.

If there are any questions concerning this license amendment, please contact our nuclear medicine physicist, Mr. Patrick Byrne, D.A.B.R., C.H.P. at 877-317-5811.

Sincerely,

A handwritten signature in cursive script that reads 'Lynn Imel'.

Lynn Imel, R.T.
Director of Radiology

**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

Richard Sanchez, M.D.

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			
Radiation biology			
Radiation dosimetry			

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.)+ _____ _____ _____		

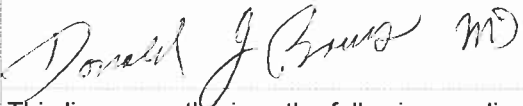
+ Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes and quantities used: 35.100, 35.200, 35.300, 35.400, 35.500, 35.600 remote afterloader units, 35.600 teletherapy units, 35.600 gamma stereotactic radiosurgery units, emerging technologies (provide list of devices).

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

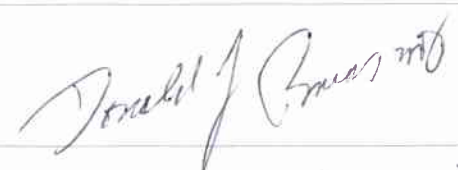
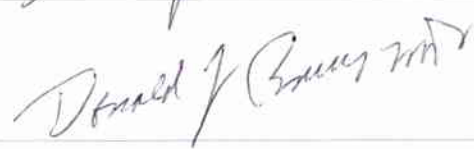
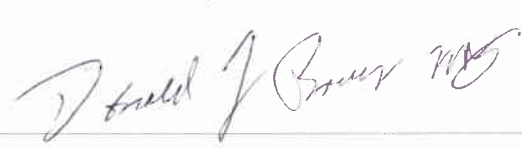
3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

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 	License/Permit Number listing supervising individual as a Radiation Safety Officer 13-17956-01
This license authorizes the following medical uses:	
<input checked="" type="checkbox"/> 35.100 <input checked="" type="checkbox"/> 35.200 <input checked="" type="checkbox"/> 35.300	<input type="checkbox"/> 35.400
<input type="checkbox"/> 35.500 <input type="checkbox"/> 35.600 (remote afterloader)	<input type="checkbox"/> 35.600 (teletherapy)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<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		Dec 15-27 08
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses		Dec 15-27 08
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses		Dec 15-27 08
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)

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

c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)

Supervising Individual <i>If training was provided by supervising RSO, AU, AMP, or ANP. (If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.)</i>	License/Permit Number listing supervising individual
	13-17956-01
License/Permit lists supervising individual as:	
<input checked="" type="checkbox"/> Radiation Safety Officer	<input checked="" type="checkbox"/> Authorized User
<input type="checkbox"/> Authorized Medical Physicist	<input type="checkbox"/> Authorized Nuclear Pharmacist
Authorized as RSO, AU, ANP, or AMP for the following medical uses:	
<input type="checkbox"/> 35.100	<input type="checkbox"/> 35.200
<input type="checkbox"/> 35.300	<input type="checkbox"/> 35.400
<input type="checkbox"/> 35.500	<input type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.600 (teletherapy)
<input type="checkbox"/> 35.1000 (_____)	

d. Skip to and complete Part II Preceptor Attestation.

OR

4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist identified on the licensee's license

- a. Provide license number. 13-17956-01
- b. Use the table in section 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.

PART II – PRECEPTOR ATTESTATION

Note: This part must be completed by the individual's preceptor. The preceptor does not have to be the supervising individual as long as the preceptor provides, directs, or verifies training and experience required. If more than one preceptor is necessary to document experience, obtain a separate preceptor statement from each.

First Section

Check one of the following:

1. Board Certification

I attest that _____ has satisfactorily completed the requirements in
Name of Proposed Radiation Safety Officer

10 CFR 35.50(a)(1)(i) and (a)(1)(ii); or 35.50 (a)(2)(i) and (a)(2)(ii); or 35.50(c)(1).

OR

2. Structured Educational Program for Proposed Radiation Safety Officers

I attest that _____ has satisfactorily completed a structural educational
Name of Proposed Radiation Safety Officer

program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).

OR

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

Preceptor Attestation (continued)

First Section (continued)

Check one of the following:

3. Additional Authorization as Radiation Safety Officer

I attest that Richard Sanchez is an
Name of Proposed Radiation Safety Officer

Authorized User Authorized Nuclear Pharmacist

Authorized Medical Physicist

identified on the Licensees license and has experience with the radiation safety aspects of similar type of use of byproduct material for which the individual has Radiation Safety Officer responsibilities

AND

Second Section

Complete for all (check all that apply):

I attest that Richard Sanchez has training in the radiation safety, regulatory issues, and
Name of Proposed Radiation Safety Officer

emergency procedures for the following types of use:

35.100

35.200

35.300 oral administration of less than or equal to 33 millicuries of sodium iodide I-131, for which a written directive is required

35.300 oral administration of greater than 33 millicuries of sodium iodide I-131

35.300 parenteral administration of any beta-emitter, or a photon-emitting radionuclide with a photon energy less than 150 keV for which a written directive is required

35.300 parenteral administration of any other radionuclide for which a written directive is required

35.400

35.500

35.600 remote afterloader units

35.600 teletherapy units

35.600 gamma stereotactic radiosurgery units

35.1000 emerging technologies, including:

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

AND

Third Section
Complete for ALL

I attest that Richard Sanchez 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

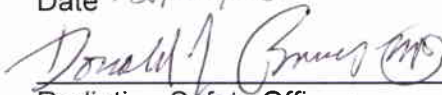
I am the Radiation Safety Officer for Marion General Hospital
Name of Facility

License/Permit Number: 13-17956-01

Name of Preceptor	Signature	Telephone Number	Date
Donald Bruns, MD		765-662-4691	12-22-08

RSO / EXECUTIVE MANAGEMENT
LETTER OF UNDERSTANDING

Date 12/22/08



Radiation Safety Officer

Our Facility MARION GENERAL HOSPITAL

Our Facility Address 441 N. WABASH AVE.
MARION, IN. 46957

Re: Radiation Safety Officer / Executive Management
Letter of Understanding

Dear DR. SANCHEZ:

You have been appointed the Radiation Safety Officer (RSO) of this facility for our United States Nuclear Regulatory Commission Materials License. This "Letter of Understanding" is prepared to comply with Title 10 Code of Federal Regulations (CFR) Part 35.24(b). This section of the regulations requires that you agree in writing to 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.

Furthermore, in compliance with 10 CFR 35.24(e),(g), the executive management of this facility agrees to provide you as RSO:

- Specific written notation of your authority, duties and responsibilities, see attached.
- 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.

Our signatures noted below will attest to the issues noted above. Please make a copy of this document for your files and return the original to my attention.

Sincerely,



Executive Management



Radiation Safety Officer

Close-out survey of part of the Hot Lab at 441 North Wabash Avenue

Performed by: Patrick J. Byrne, D.A.B.R., C.H.P.
Medical Physics Consultants, Inc.

Radioactive materials usage at this address of use was limited to unsealed radioactive materials as licensed under 10 CFR 35.100, 200, and 300. Sealed radioactive materials as used under 10 CFR 35.400 were rarely received and stored in this area. In addition, sealed sources used to perform quality control and calibration were also stored in this area.

Wipe tests for removable radioactive contamination were taken on 12/10/08 and analyzed in a Ludlum Model 243 (S/N: 145366) Shielded Well Scintillator coupled to a Ludlum Model 2200 (S/N: 138705) Scaler Ratemeter. A window of 50 to 400 keV was used to analyze the wipes. The efficiency of this system for Cobalt-57 is 1.17 dpm/cpm.

The radiation levels survey was performed on 12/10/08 by Patrick Byrne, using a Ludlum Model 14C Geiger-Muller survey meter (S/N: 126824). The meter was calibrated on 06/13/08. The range used for the radiation level survey was 0.0 to 0.2 mR/hr.

Visual Inspection

The area was visually inspected to ensure that all radioactive waste had been removed. No radioactive material was located in the area.

Radiation Level Survey

No area demonstrated radiation levels in excess of the background reading of 0.02 mR/hr.

Sealed Sources

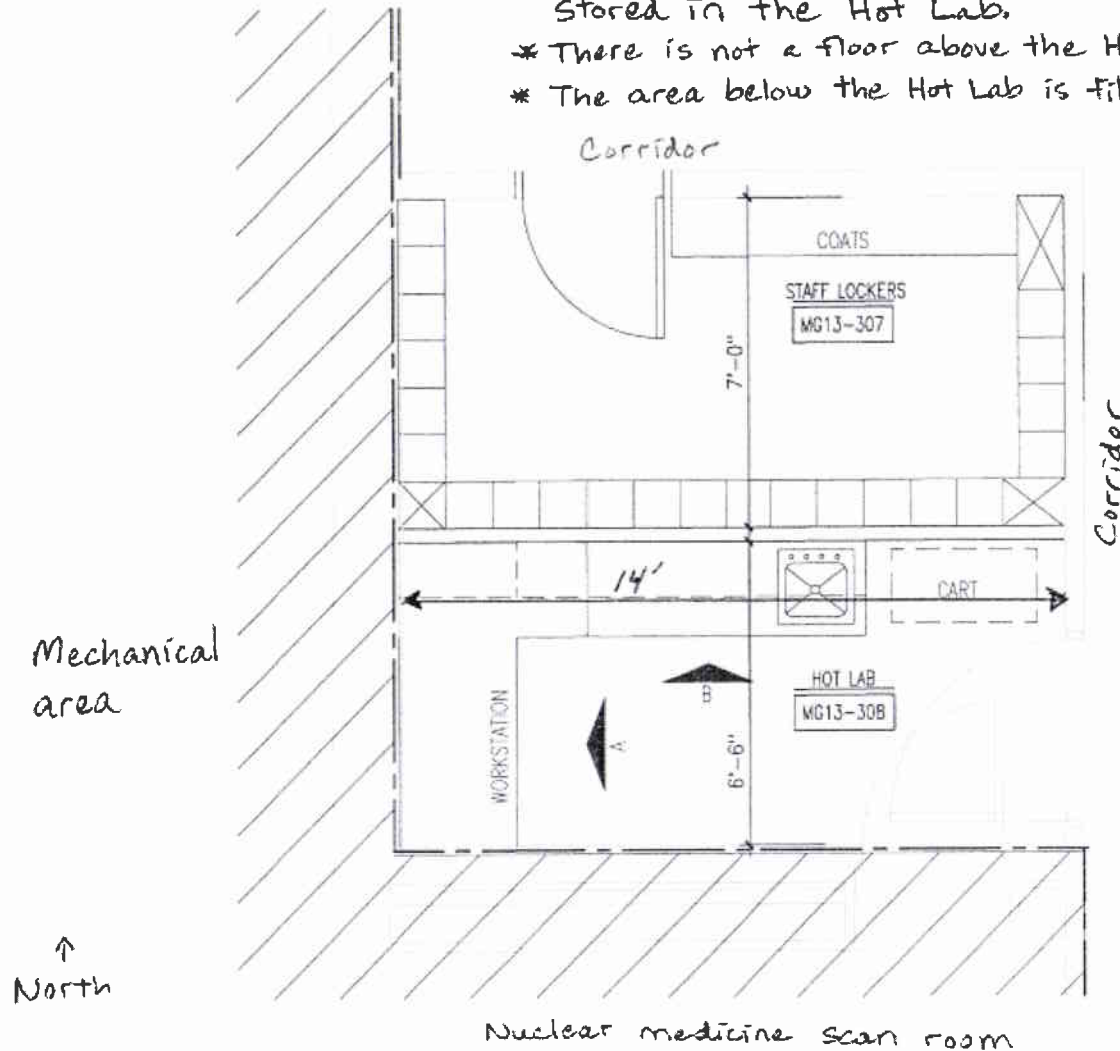
All sealed sources have been moved to the portion of the Hot Lab that is to remain utilized as a Hot Lab.

Conclusion

As of 12/10/08, the close out area was free of radioactive materials and contamination.

Attachment 9.1

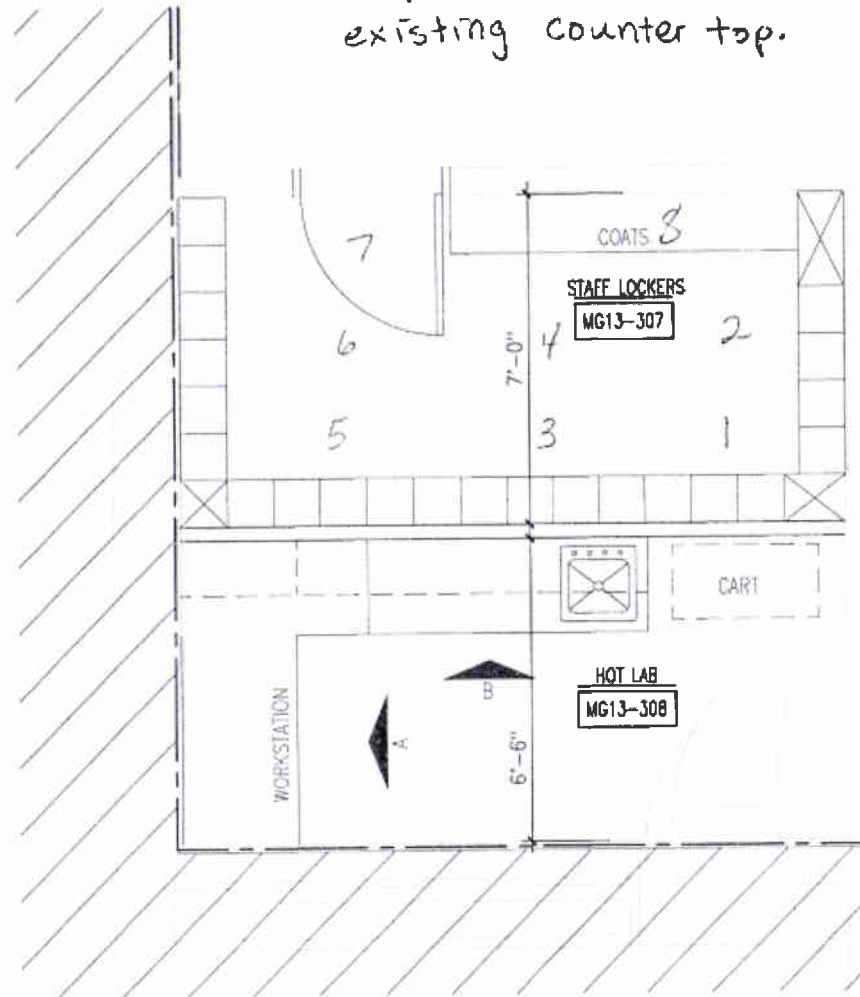
- * The Hot Lab will be controlled by a lockable door.
- * All radioactive materials and wastes will be stored in the Hot Lab.
- * There is not a floor above the Hot Lab.
- * The area below the Hot Lab is file storage/mechanical.



Close out map

* Numbers refer to locations of wipe samples

* Wipes 7 and 8 were taken on an existing counter top.



Removable Contamination Survey Results

Wipe samples were counted in a Ludlum Model 243 Shielded Well Scintillator (S/N: 145366) coupled to a Ludlum Model 2200 Scaler Ratemeter (S/N: 138705). The efficiency of this system for Cobalt-57 is 1.17 dpm/cpm.

Background: 285 counts per minute

Wipe Number	Gross counts per minute	Net counts per minute	Disintegrations per minute
1	235	0	0
2	285	0	69.03
3	281	0	0
4	241	0	23.4
5	255	0	24.57
6	328	43	50.3
7	492	207	242.2
8	355	70	81.9

*Please refer to the attached survey map for wipe locations.

Maximum removable contamination occurred in area 7. Gross count rate = 492 cpm/100cm². Net count rate (gross minus background) = 492 – 285 = 207 cpm/100cm². Net removable disintegrations per minute = 207 cpm/100cm² x 1.17 dpm/cpm = 242.2 dpm/100cm².

Conclusion

As of 12/10/08, all radioactive materials have been removed from the area of use and no removable contamination is present.

From:

Betsy Bouwkamp, CNMT
Nuclear Medicine Dept.
Marion General Hospital
Marion, IN. 46952



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MATERIALS LICENSING SECTION
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

RETURN RECEIPT
REQUESTED