

# The Hospital of Central Connecticut

## at New Britain General and Bradley Memorial

January 19, 2009

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www.tFocc.org Laurence A. Tanner, Pi∋sident

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100 Gran I Street

New Britain, C 106050 860-2 4-5011

81 Meriden Avenue Southington, C <sup>+</sup> 06489

860 2 6-5000

Licensing Assistant Section Nuclear Materials Safety Branch U.S. Nuclear Regulatory Commission, Region 1 475 Allendale Road King of Prussia, PA 19406-1415

Dear Sir or Madam:

03001250

Attached is an amendment request on our facilities NRC license (license number: 06-02388-01).

The Hospital of Central Connecticut is requesting the following changes to our NRC license.

• Add LaDonna Dakofsky, M.D. as an authorized user (Iridium-192 for uses in a High Dose Rate Remote Afterloader Unit). Attached is NRC Form 313A (AUS) in support of this change.

If you have any technical question regarding this amendment request, please do not hesitate to contact me at (860) 224-5520 or by e-mail at gp219@columbia.edu

Prepared by:

George Pavlonnis, III M.S. DABR American Board of Radiology Certified Medical Physicist

Reviewed and Approved by:

Clarence Silvia Senior Vice President, The Hospital of Central Connecticut

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NMES/RONA LONTERING AND

AND PREC	U.S. NUCLEAR REGULATORY CO R TRAINING AND EXPERIENCE EPTOR ATTESTATION		APPROVED B EXPIRES: 10/	Y OMB: NO. 3150- 01: 31/2008
	d under 35.400 and 35.600) 490, 35.491, and 35.690]			
Name of Proposed Authorized User	State or Territory Wh	nere License	d	
LaDonna Dakofsky	Connecticut			
Requested 35.400 N	Manual brachytherapy sources 🔲 35.600	) Teletherar	oy unit(s)	
Authorization(s) 35.400 C (check all that apply)	Ophthalmic use of strontium-90 🔲 35.600	) Gamma si	tereotactic ra	adiosurgery unit s
(check an that apply) 35.600 F	Remote afterloader unit(s)			
	PART I TRAINING AND EXPERIEN (Select one of the three methods below			
date of application or the individ	ing Board Certification, must have been ob ual must have obtained related continuing was completed. Provide dates, duration, ses checked above.	education a	and experien	ice since the
1. Board Certification				
a. Provide a copy of the board o	certification.			
b. For 35.600, go to the table in which authorization is sough	a 3.e. and describe training provider and da t.	ates of train	ing for each	type of use for
c. Skip to and complete Part II	Preceptor Attestation.			
2. Current 35. <u>6</u> 00 Authorized U	se <u>r Requesting Additional Authorizatio</u>	<u>n for 35.60</u>	<u>0 Use(s) Ch</u>	ecked Above
	to document training for new device.			
b. Skip to and complete Part II	-			
✓ 3. Training and Experience for				
a. Classroom and Laboratory T		35.6	90	
Description of Training	Location of Training		Clock Hours	Dates of Training*
Radiation physics and instrumentation	University of Pennsylvania (SEE ATTACHED LETTER)		110	7/88 to 6/91
Radiation protection	University of Pennsylvania (SEE ATTACHED LETTER)		11	7/88 to 6/91
Mathematics pertaining to the use and measurement of radioactivity	University of Pennsylvania (SEE ATTACHED LETTER)		30	7/88 to 6/91
Radiation biology	University of Pennsylvania (SEE ATTACHED LETTER)		96	7/88 to 6/91
	Total Hours of Training:		<u>,</u>	

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#### NRC FORM 313A (AUS) (10-2007)

#### U.S. NUCLEAR REGULATORY COMMISSION

## AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

## 3. <u>Training and Experience for Proposed Authorized User</u> (continued)

b. Supervised Work and Clinical Experience for 10 CFR 35.490 (If more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this page.)

Supervised Work Experience		Total Hours of Experience:		
Description of Experience Must Include:	Location of Experien Permit Number of		Confirm	Dates of Experience
Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys			Yes	
Checking survey meters for proper operation			Yes No	
Preparing, implanting, and safely removing brachytherapy sources			Yes	
Maintaining running inventories of material on hand			Yes	}
Using administrative controls to prevent a medical event involving the use of byproduct material			Yes	
Using emergency procedures to control byproduct material			Yes	

Location of Experience/License or Permit Number of Facility	Dates of Experience*
License/Permit Number listing supervising in Authorized User	dividual as an
	Permit Number of Facility

FORM 313A (AUS) <sup>07)</sup>		U	J.S. NUCLEAR REGUL	ATORY COMMISS
		CE AND PRECEPTOR	ATTESTATION (c	ontinued)
Training and Experience for Pro		<u>ser</u> (continued)		
c. Supervised Clinical Experience	for 10 CFR 35.491			
Description of Experience	Location of E Permit N	Clock Hours	Dates of Experience	
Use of strontium-90 for ophthalmic treatment, including: examination of each individual to be treated; calculation of the dose to be administered; administration of the dose; and follow up and review of each individual's case history				
Supervising Individual		License/Permit Number Authorized User	listing supervising ind	dividual as an
d. Supervised Work and Clinical E	Experience for 10 CFR	35 690		
Remote afterloader unit(s)	·		mma stereotactic ra	adiosurgery un
Supervised Work Experience		Total Hours of Experience:	f 1,000	
Description of Experience Must Include:		xperience/License or umber of Facility	Confirm	Dates of Experience
Reviewing full calibration measurements and periodic spot-checks	University of Pennsylvania (SEE ATTACHED LETTER)		✓ Yes	7/88 to 6/91
Preparing treatment plans and calculating treatment doses and times	University of Pennsy (SEE ATTACHED )		✓ Yes	7/88 to 6/91
calculating treatment doses and		LETTER) /lvania		7/88 to 6/91 7/88 to 6/91
calculating treatment doses and times Using administrative controls to prevent a medical event involving the use of byproduct	(SEE ATTACHED ) University of Pennsy	LETTER) /lvania LETTER) /lvania	No Yes	
calculating treatment doses and times Using administrative controls to prevent a medical event involving the use of byproduct material Implementing emergency procedures to be followed in the event of the abnormal operation	(SEE ATTACHED ) University of Pennsy (SEE ATTACHED ) University of Pennsy	LETTER) /lvania LETTER) /lvania LETTER)	<ul> <li>No</li> <li>✓ Yes</li> <li>No</li> <li>✓ Yes</li> <li>✓ Yes</li> </ul>	7/88 to 6/91

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#### NRC FORM 313A (AUS) (10-2007)

## U.S. NUCLEAR REGULATORY COMMISS ON

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## AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

## 3. <u>Training and Experience for Proposed Authorized User</u> (continued)

d. Supervised Work and Clinical Experience for 10 CFR 35.690 (continued)

Clinical experience in radiation oncology as part of an approved formal training program	Location of Experience/License or Permit Number of Facility	Dates of Experience
<ul> <li>Approved by:</li> <li>✓ Residency Review Committee for Radiation Oncology of the ACGME</li> <li>Royal College of Physicians and Surgeons of Canada</li> <li>Committee on Postdoctoral Training of the American Osteopathic Association</li> </ul>	University of Pennsylvania PA-0131 (SEE ATTACHED LETTER)	7/88 to 6/91
Supervising Individual	License/Permit Number listing supe Authorized User	ervising individual as an
Neha Vapiwala, M.D. Residency	y Director PA-0131	

e. For 35.600, describe training provider and dates of training for each type of use for which authorization is sought.

Description of Training	Training Provider and Dates		
	Remote Afterloader	Teletherapy	Gamma Stereotactic Radiosurgery
Device operation	Neal Goldberg, M.D. AU 3/10/08 to Present	n/a	n/a
Safety procedures for the device use	Neal Goldberg, M.D. AU 3/10/08 to Present	n/a	n/a
Clinical use of the device	Neal Goldberg, M.D. AU 3/10/08 to Present	n/a	n/a
Individual (If more tha	dual. If training provided by Supervising in one supervising individual is necessary ad work experience, provide multiple	License/Permit Number listing sup Authorized User	ervising individual as an
Neal Goldberg, N	A.D. Authorized User	06-2388-01	
Authorized for the	following types of use:		
✓ Remote afterle	pader unit(s)	rapy unit(s) 📃 Gamma st	ereotactic radiosurgery unit(s)
f. Provide comple	eted Part II Preceptor Attestation.		

#### NRC FORM 313A (AUS) (10-2007)

## U.S. NUCLEAR REGULATORY COMMISS ON

## AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

#### 3. Training and Experience for Proposed Authorized User (continued)

d. Supervised Work and Clinical Experience for 10 CFR 35.690 (continued)

Clinical experience in radiation oncology as part of an approved formal training program	Location of Experience/License or Permit Number of Facility	Dates of Experience
Approved by:		
Residency Review Committee for Radiation Oncology of the ACGME		
Royal College of Physicians and Surgeons of Canada		
Committee on Postdoctoral Training of the American Osteopathic Association		
Supervising Individual	License/Permit Number listing supervis Authorized User	ing individual as an

# e. For 35.600, describe training provider and dates of training for each type of use for which authorization is sought.

Description of Training	Training Provider and Dates		
	Remote Afterloader	Teletherapy	Gamma Stereotactic Radiosurgery
Device operation	George Pavlonnis, AMP 4/1/08 to Present	n/a	n/a
Safety procedures for the device use	George Pavlonnis, AMP 4/1/08 to Present	n/a	n/a
Clinical use of the device	George Pavlonnis, AMP 4/1/08 to Present	n/a	n/a
Individual (If more tha	dual. If training provided by Supervising n one supervising individual is necessary d work experience, provide multiple	License/Permit Number listing supe Authorized User	ervising individual as an
George Pavlonni	s, Auth Medical Physicist	06-2388-01	
Authorized for the	following types of use:	······································	
✓ Remote afterlo	pader unit(s)	apy unit(s) 🛛 🗌 Gamma ste	ereotactic radiosurgery unit(s)
f. Provide comple	ted Part II Preceptor Attestation.	• • • • • • • • • • • • • • • • • • •	

NRC FORM 313A (AUS)		U.S. NUCLEAR REGULATORY COMMISS ON			
	ISER TRAINING AND EXPER	RIENCE AND PRECEPTOR ATTESTATION (continued)			
PART II – PRECEPTOR ATTESTATION					
individual as long	completed by the individual's as the preceptor provides, dir	preceptor. The preceptor does not have to be the supervising rects, or verifies training and experience required. If more than ence, obtain a separate preceptor statement from each.			
		attesting that the individual has knowledge to fulfill the duties of the al's "general clinical competency."			
First Section Check one of the follow	ing for each requested auth	orization:			
<u>For 35,490:</u>					
Board Certification	!				
[_] I attest that	Name of Proposed Authorized Us	has satisfactorily completed the requirements in			
		mpetency sufficient to function independently as an ources for the medical uses authorized under 10 CFR 35.400.			
-		OR			
Training and Exper	ience				
attest that	Name of Proposed Authorized Us	has satisfactorily completed the 200 hours of			
clinical experi level of compe	d laboratory training, 500 hour ence in radiation oncology, as	s of supervised work experience, and 3 years of supervised required by 10 CFR 35.490(b)(1) and (b)(2), and has achieved a dependently as an authorized user of manual brachytherapy			
<u>For 35.491:</u>					
I attest that	Name of Proposed Authorized Lis	has satisfactorily completed the 24 hours of			
has used stro	d laboratory training applicable ntium-90 for ophthalmic treatm /el of competency sufficient to	e to the medical use of strontium-90 for ophthalmic radiotherapy nent of 5 individuals, as required by 10 CFR 35.491(b), and has function independently as an authorized user of strontium-90 fc			
Second Section					
<u>For 35.690:</u>					
Board Certification					
I attest that		has satisfactorily completed the requirements in			
35.690(a)(1).	Name of Proposed Authorized Us	er			
Training and Expe	rience	OR			
✓ I attest that	LaDonna Dakofsy	has satisfactorily completed 200 hours of classroom			
	Name of Proposed Authorized V				
	and laboratory training, 500 hours of supervised work experience, and 3 years of supervised clinical experience in radiation therapy, as required by 10 CFR 35.690(b)(1) and (b)(2).				
AND					

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NRC FORM 313A (AUS)		<u> </u>	U.S. NUCLEAR REGUL	ATORY COMMISS ON
	NG AND EXPERIENC	E AND PRECEP		ontinued)
Preceptor Attestation (continued)				
Third Section				
For 35.690: (continued)				
✓ I attest that LaDonna Da		has received tr	aining required in 35.690	D(c) for device
Name of Pr operation, safety procedures checked below.	roposed Authorized User s, and clinical use for	the type(s) of use	for which authorization i	s sought, as
✓ Remote afterloader unit(	s) 🚺 Teletherapy (	unit(s) 🗌 Gan	nma stereotactic radiosu	rgery unit(s)
• • • • • • • • • • • • • • • • • • • •	AN	ID		
Fourth Section				
✓   attest that LaDonna Da Name of Pr	kofsy	has achieved a	a level of competency su	fficient to
achieve a level of competen	,	n independently	as an authorized user for	
✓ Remote afterloader unit(	s) 📋 Teletherapy (	unit(s) 🗌 Gam	ima stereotactic radiosu	rgery unit(s)
Fifth Section				
Complete the following for precepto	or attestation and sig	gnature:		
✓ I meet the requirements in 1 an authorized user for:	0 CFR 35.490, 35.49	1, 35.690, or equi	valent Agreement State	requirements, as
35.400 Manual brachythe	erapy sources 🔲 3	5.600 Teletherapy	v unit(s)	
🗌 35.400 Ophthalmic use c	of strontium-90 📃 38	5.600 Gamma ste	reotactic radiosurgery u	nit(s)
✓ 35.600 Remote afterload	ler unit(s)			
Name of Preceptor	Signature		Telephone Number	Date
Neal Goldberg, M.D.	nel _	SA/	(860) 224-5520	01/19/2009
License/Permit Number/Facility Name		<u>~-</u> µ		
06-02388-01 / The Hospital of Central	l Connecticut			

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Environmental Health & Radiation Safety

January 14, 2009

LaDonna Dakofsky, M.D. 7 Sweetbriar Lane Sandy Hook, CT 06482-1481

Dear Mr. Dakofsky:

In addition to the enclosed form, you may need to submit a letter from the University of Pennsylvania confirming that the signatory of the letter is an Authorized User as defined by the NRC regulations. Because the form attests only to you completion of the residency program here and not to your training on high dose-rate remote afterloaders, I am not certain whether this confirmation is necessary, but suggest you submit it with the form to head off later questions.

The enclosed form signed by Dr. Vapiwala should be sufficient to demonstrate that you completed three years of supervised clinical experience in radiation therapy as part of a training program approved by the Residency Review Committee for Radiation Oncology of the Accreditation Council for Graduate Medical Education. Dr. Vapiwala is Director of the Residency Program for Radiation Oncology for the University of Pennsylvania School of Medical. The form also lists the classroom hours and supervised work experience hours you completed during your residency.

By this letter, I confirm that Dr. Vapiwala is an Authorized User under the Pennsylvania License of Broad Scope No. PA-0131 for uses listed PA Code 25.228 (linear accelerator), 10 CFR 35.400 (low dose-rate brachytherapy), and 10 CFR 35.600 (high dose-rate brachytherapy). The NRC regulations are incorporated into the Pennsylvania regulations by reference.

If the NRC license reviewer needs a copy of our DEP License, I would ask that person to contact me directly at 215-898-2106 or email me at <u>keith@ehrs.upenn.edu</u>.

Sincerely,

Vitte DZ

Keith D. Brown, Ph.D., CHP Medical Health Physicist

## Documentation of Radiation Oncology Residency Training for Linear Accelerator and Manual Brachytherapy For Physicians Who Completed the Residency at Penn

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Applicant Name: <u>LaDonna</u>	<u>(Jung) D</u>	akofsky
State(s) where licensed to pra	ctice me	dicine: <u>CT</u>
Residency at :University of	of Pennsy	ylvania
Dates of Residency:July_	<u>1988 to 、</u>	June 1991
Residency approved by	X	Residency Review Committee for Radiation Oncology of the ACGME
		Royal College of Physicians and Surgeons of Canada
		Committee on Postdoctoral Training of the American Osteopathic Association

## Classroom and Laboratory Training:

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Description of Training	Clock Hours (must total 200 hours or more)
Radiation physics and instrumentation	110
Radiation Protection	11
Mathematics pertaining to the use and measurement of radioactivity	30
Radiation Biology	96

## Supervised Work Experience:

	Clock Hours (must total 700 hours or more):	
Total hours of experience during residency in planning treatments, using radioactive sources and radiation producing machines to treat patients, ensuring correct delivery of radiation, and handling radioactive material	1000	

Supervised clinical work experience in linear accelerator use included the following required topics:

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X	Reviewing full calibration measurements and periodic spot checks of linear accelerators
X	Preparing treatment plans and calculating treatment doses and times for linear accelerator treatments
X	Using administrative controls to prevent a medical event involving a linear accelerator
X	Implementing emergency procedures to be followed in the event of the abnormal operation of the linear accelerator or console
$\mathbf{X}$	Checking and using survey meters
X	Selecting the proper dose and how it is administered

Supervised clinical work experience in the use of manual brachytherapy sources included the following required topics:

X	Preparing, implanting, and safely removing brachytherapy sources
X	Using administrative controls to prevent a medical event involving use of radioactive material
X	Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys
X	Using emergency procedures to control byproduct material
$\times$	Maintaining running inventories of material on hand
X	Checking survey instruments for proper operation

## Device Specific Training for Linear Accelerator

Training included the following required topics:

X	Device operation
X	Safety procedures
$\mathbf{X}$	Clinical Uses

Certification:

I attest that the above named physician has completed the training documented above. I further attest that I am an Authorized User under the NRC or Agreement State license at the site of the residency program named above to treat patients using a linear accelerator and manual low dose-rate brachytherapy sources.

Signature:	Mulgarin Date:	
Printed Name:	Neha Vapiwala, M.D., Residency Director	

Telephone Number: \_\_\_\_\_ 215-662-3694

The American Board of Radiology Organized through the cooperation of the American College of Radiology, the American Roentgen Ray Society, the American Radium Society, the Radiological Society of North America, the Section on Radiology of the American Medical Association, the American Society for Therapeutic Radiology and Oncology, the Association of University Radiologists, and American Association of Physicists in Medicine Hereby certifies that LaDonna Jung Bakofsky Has pursued an accepted course of graduate study and clinical work, has met certain standards and qualifications and has passed the examinations conducted under the authority of The American Board of Radiology On this tenth day of June, 1993 Shereby demonstrating to the satisfaction of the Board AMERICAN BOARD that she is qualified to practice the specialty of Radiation Oncology Tee 7 Rogers MD Laster & Priture Bresident Bresident Formeth L. Tralfordage MD. Executive Birertur

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

<u>1/19/2009</u>, and to inform you that the initial processing which includes an administrative review has been performed.

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

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.

143231 Your action has been assigned Mail Control Number When calling to inquire about this action, please refer to this control number. You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI) (6-96)

Sincerely, Licensing Assistance Team Leader and the second second