

Covenant HealthCare
1447 North Harrison
Saginaw, MI 48602
989.583.0000 Tel



January 30, 2009

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

Re: Amendment to NRC License 21-01492-02 Covenant Medical Center, Inc.

Dear Sir or Madam:

The purpose of this letter is to amend our current NRC license to reflect the following changes:

Item #1 Please remove the following individual as the Radiation Safety Officer (RSO):

Mark Robert Ludka, M.D.

Item #2 Please list the following individual as the RSO on our NRC license:

Chirdeep Bhutani, M.D.

Additionally, we have enclosed a copy of the RSO/Executive Management agreement letter, the NRC Form 313A(RSO), and copy of our current NRC license.

Thank you for your cooperation. If you have any questions or require additional information, please contact our physicist, Kevin B. Miller at 734-662-3197.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel George", is written over the typed name.

Daniel George
Vice President
Covenant Medical Center, Inc.

RECEIVED FEB 04 2009

U.S. NUCLEAR REGULATORY COMMISSION

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee 1. Covenant Medical Center, Inc. 2. 1447 N. Harrison Saginaw, MI 48602	In accordance with letter dated April 25, 2008 , 3. License number 21-01492-02 is amended in its entirety to read as follows: <hr/> 4. Expiration date December 31, 2014 <hr/> 5. Docket No. 030-02012 Reference No.
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6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Any byproduct material permitted by 10 CFR 35.100	A. Any	A. As needed
B. Any byproduct material permitted by 10 CFR 35.200	B. Any	B. As needed
C. Any byproduct material permitted by 10 CFR 35.300	C. Any	C. As needed
D. Iodine-125 permitted by 10 CFR 35.400	D. Sealed sources (Implant Sciences Model No. 3500; Medi-Physics/Amersham Model No. 6711 OncoSeed; Mentor Model No. I-125SL or I-125SH and IsoAid L.L.C., Model IAI-125A)	D. 1.15 curies
E. Any byproduct material permitted by 10 CFR 31.11	E. Prepackaged Kits	E. As needed

9. Authorized Use:

- A. Any uptake, dilution and excretion study permitted by 10 CFR 35.100.
- B. Any imaging and localization study permitted by 10 CFR 35.200.
- C. Any diagnostic study or therapy procedure permitted by 10 CFR 35.300.
- D. Any manual brachytherapy procedure permitted by 10 CFR 35.400.
- E. In vitro studies.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number
21-01492-02

Docket or Reference Number
030-02012

Amendment No. 54

CONDITIONS

10. A. Licensed material, excluding 6.D., may be used at the licensee's facilities located at 700 Cooper Avenue, Saginaw, Michigan.
- B. Licensed material, excluding iodine-131 for thyroid carcinoma therapies may be used at the licensee's facilities located at 5400 Mackinaw Road, Saginaw Michigan.
11. The Radiation Safety Officer for this license is Mark Robert Ludka, M.D.
12. Licensed material is only authorized for use by, or under the supervision of:
- A. Individuals permitted to work as an authorized user in accordance with 10 CFR 35.13 and 35.14.
- B. The following individuals are authorized users for medical uses:

Authorized User

Material and Use

Joseph E. Talbot, M.D.	10 CFR 35.100, 35.200 and 35.300.
Scott E. Cheney, M.D.	10 CFR 35.100 and 35.200.
Sanjay J. Talati, M.D.	10 CFR 35.100 and 35.200.
George F. Ascherl, M.D.	10 CFR 35.100, 35.200 and 35.300.
Harvey Yee, M.D.	10 CFR 35.100, 35.200 and 35.300.
C.E. Mueller, M.D.	10 CFR 35.100, 35.200, 35.300 and 31.11.
Robert B. Saltzman, M.D.	10 CFR 35.100, 35.200, 35.300 and 31.11.
Mark Robert Ludka, M.D.	10 CFR 35.100, 35.200, 35.300 and 31.11.
Kristin M. Nelsen, M.D.	10 CFR 35.100, 35.200, and 31.11.
Rajnikant H. Mehta, M.D.	10 CFR 35.400.
Rajesh P. Kotecha, M.D.	10 CFR 35.400.
Paul G. Kocheril, M.D.	10 CFR 35.400.
James F. Littles, M.D.	10 CFR 35.400.
Sigrid E. Messana, D.O.	10 CFR 35.100, 35.200, and 31.11.
Chirdeep Bhutani, M.D.	10 CFR 35.100, 35.200 and 35.300.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number
21-01492-02

Docket or Reference Number
030-02012

Amendment No. 54

Sambasiva Kottamasu, M.D.	10 CFR 35.100, 35.200, 35.300 and 31.11.
Ramesh Vedula, M.D.	10 CFR 35.400.
Rita Ratani, M.D.	10 CFR 35.100 and 35.200.
Sultan Bhimani, M.D.	10 CFR 35.100, 35.200, and 31.11.
Shahzad Sadiq, M.D.	10 CFR 35.100, 35.200, and 35.300.
Ram K. Gadam, M.D.	10 CFR 35.100, 35.200, 35.300 and 35.400
Steve Min, D.O.	10 CFR 35.100, 35.200, and 35.300

13. The licensee may transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Materials."
14. In addition to the possession limits in Item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) for establishing decommissioning financial assurance.
15. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. This license condition applies only to those procedures that are required to be submitted in accordance with the regulations. Additionally, this license condition does not limit the licensee's ability to make changes to the radiation protection program as provided for in 10 CFR 35.26. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated September 24, 2004.
- B. Letters dated August 21, 2006, and December 4, 2006.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date

JUN 25 2008

By

Toye L. Simmons
Toye L. Simmons

Materials Licensing Branch
Region III



RSO/EXECUTIVE MANAGEMENT
LETTER OF UNDERSTANDING

January 16, 2009

Chirdeep Bhutani M.D.
Covenant HealthCare Systems
1447 N. Harrison Street
Saginaw, MI 48602

Re: Radiation Safety Officer/Executive Management
Letter of Understanding

Dear Dr. Bhutani:

You have been appointed the Radiation Safety Officer (RSO) of this facility for our United States Nuclear Regulator 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

Daniel George
Vice President

Chirdeep Bhutani M.D.
Radiation Safety Officer

**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

Chirdeep Bhutani

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
This license authorizes the following medical uses:	
<input type="checkbox"/> 35.100	<input type="checkbox"/> 35.200
<input type="checkbox"/> 35.500	<input type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.1000 (_____)
<input type="checkbox"/> 35.300	<input type="checkbox"/> 35.400
<input type="checkbox"/> 35.600 (teletherapy)	

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	Mark Robert Ludka, M.D.	7/1/0 1/21/09
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	Mark Robert Ludka, M.D.	7/1/06 - 1/21/09
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	Mark Robert Ludka, M.D.	7/1/06 - 1/21/09
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 *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.)*

License/Permit Number listing supervising individual

Mark Robert Ludka, M.D.

21-01492-02

License/Permit lists supervising individual as:

- Radiation Safety Officer Authorized User Authorized Nuclear Pharmacist
- Authorized Medical Physicist

Authorized as RSO, AU, ANP, or AMP for the following medical uses:

- 35.100 35.200 35.300 35.400
- 35.500 35.600 (remote afterloader) 35.600 (teletherapy)
- 35.600 (gamma stereotactic radiosurgery) 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.
- 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 Chirdeep Bhutani, M.D. is an
Name of Proposed Radiation Safety Officer

Authorized User

Authorized Nuclear Pharmacist

Authorized Medical Physicist

identified on the Licensee's 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 Chirdeep Bhutani, M.D. 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

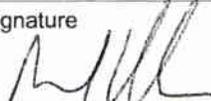
**Third Section
Complete for ALL**

I attest that **Chirdeep Bhutani, M.D.** 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 **Covenant Medical Center, Inc.**
Name of Facility

License/Permit Number: **21-01492-02**

Name of Preceptor Mark Robert Ludka, M.D.	Signature 	Telephone Number	Date 1/21/09
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U.S. NUCLEAR REGULATORY COMMISSION

MATERIALS LICENSE

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Licensee	In accordance with letter dated April 25, 2008 ,
1. Covenant Medical Center, Inc.	3. License number 21-01492-02 is amended in its entirety to read as follows:
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	5. Docket No. 030-02012 Reference No.

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B. Any byproduct material permitted by 10 CFR 35.200	B. Any	B. As needed
C. Any byproduct material permitted by 10 CFR 35.300	C. Any	C. As needed
D. Iodine-125 permitted by 10 CFR 35.400	D. Sealed sources (Implant Sciences Model No. 3500; Medi-Physics/Amersham Model No. 6711 OncoSeed; Mentor Model No. I-125SL or I-125SH and IsoAid L.L.C., Model IAI-125A)	D. 1.15 curies
E. Any byproduct material permitted by 10 CFR 31.11	E. Prepackaged Kits	E. As needed

9. Authorized Use:

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SUPPLEMENTARY SHEET**

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James F. Littles, M.D.	10 CFR 35.400.
Sigrid E. Messana, D.O.	10 CFR 35.100, 35.200, and 31.11.
Chirdeep Bhutani, M.D.	10 CFR 35.100, 35.200 and 35.300.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**

License Number
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- A. Application dated September 24, 2004.
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FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date

JUN 25 2008

By

Toye L. Simmons
Toye L. Simmons

Materials Licensing Branch
Region IIII



RSO/EXECUTIVE MANAGEMENT
LETTER OF UNDERSTANDING

January 16, 2009

Chirdeep Bhutani M.D.
Covenant HealthCare Systems
1447 N. Harrison Street
Saginaw, MI 48602

Re: Radiation Safety Officer/Executive Management
Letter of Understanding

Dear Dr. Bhutani:

You have been appointed the Radiation Safety Officer (RSO) of this facility for our United States Nuclear Regulator 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:

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- Ensure that radiation safety activities are being performed in accordance with our own approved procedures and all regulatory requirements.

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- 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

Daniel George
Vice President

Chirdeep Bhutani M.D.
Radiation Safety Officer

**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

Chirdeep Bhutani

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.

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- 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
This license authorizes the following medical uses:	
<input type="checkbox"/> 35.100	<input type="checkbox"/> 35.200
<input type="checkbox"/> 35.500	<input type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.400
	<input type="checkbox"/> 35.600 (teletherapy)
	<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	Mark Robert Ludka, M.D.	7/1/0 1/21/04
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	Mark Robert Ludka, M.D.	7/1/06 - 1/21/09
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	Mark Robert Ludka, M.D.	7/1/06 - 1/21/04
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)

<p>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></p> <p>Mark Robert Ludka, M.D.</p>	<p>License/Permit Number listing supervising individual</p> <p style="text-align: center;">21-01492-02</p>
<p>License/Permit lists supervising individual as:</p> <p><input checked="" type="checkbox"/> Radiation Safety Officer <input type="checkbox"/> Authorized User <input type="checkbox"/> Authorized Nuclear Pharmacist</p> <p><input type="checkbox"/> Authorized Medical Physicist</p> <p>Authorized as RSO, AU, ANP, or AMP for the following medical uses:</p> <p><input checked="" type="checkbox"/> 35.100 <input checked="" type="checkbox"/> 35.200 <input checked="" type="checkbox"/> 35.300 <input checked="" type="checkbox"/> 35.400</p> <p><input type="checkbox"/> 35.500 <input type="checkbox"/> 35.600 (remote afterloader) <input type="checkbox"/> 35.600 (teletherapy)</p> <p><input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery) <input type="checkbox"/> 35.1000 (_____)</p>	

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.
- 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)

AND

**Third Section
Complete for ALL**

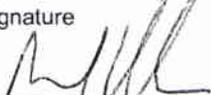
I attest that **Chirdeep Bhutani, M.D.** has achieved a level of radiation safety knowledge
Name of Proposed Radiation Safety Officer

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 **Covenant Medical Center, Inc.**
Name of Facility

License/Permit Number: **21-01492-02**

Name of Preceptor Mark Robert Ludka, M.D.	Signature 	Telephone Number	Date 1/21/09
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COVENANT
HealthCare
Nuclear Medicine
John O'Brien

Covenant HealthCare
1447 North Harrison
Saginaw, MI 48602

MATERIALS MGT HARRISON
389-583-4172
COVENANT HEALTHCARE
1447 N HARRISON
SAGINAW MI 48602

1 LBS 1 OF 1
DWT: 12,9,1

ADDRESS SERVICE REQUESTED

SHIP TO:
OFFICE OF MATERIALS LICENSING
US NUCLEAR REGULATORY COMM REGION 3
SUITE 210
2443 WARRENVILLE RD.
LISLE IL 60532-4352



UPS GROUND
TRACKING #: 1Z 9VF 091 03 9909 4799



BILLING: P/P

Reference#1: 9010.8851

UIS 11.0.17

HXPIE70 84.0A 10/2008



Part # 156148-434 NRIT11-04

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1/015

US NUCLEAR REGULATORY COMM REGION 3
2443 WARRENVILLE RD
STE 210
LISLE IL 60532-3673

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