

Nuclear Regulatory Commission Region III
Materials Licensing Branch
2443 Warrenville Road,
Lisle, Illinois 60532-4252

March 16, 2009

Re: NRC Materials License Number 24-18628-01

Please amend our materials license to reflect North Kansas City's nomination of Martin S. Richman, M.S. to be Radiation Safety Officer.

Mr. Richman has been North Kansas City Hospital's full time therapy medical physicist since 1990 and has worked continuously under my supervision since that time by performing many of the radiation safety responsibilities required in the hospital. His long term and recent experience and training include equipment calibrations, leak testing, record keeping, shipping, receiving and radiation surveys and proper disposal of materials. His work experience and training has been continuous for 35.400, 35.600 and 35.1000 medical uses but recently he has spent time in the related area of nuclear medicine to review the specific applications of 35.100, 35.200 and 35.300 medical uses.

Mr. Richman is listed on North Kansas City Hospital's license as the Intravascular Brachytherapy Physicist. He was also listed as RSO on NRC Materials License SUD-1442.

NRC Form 313A (RSO) attached.



Kenneth Arnett, M..D.
Radiation Safely Officer
North Kansas City Hospital

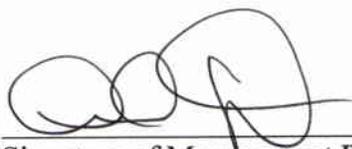
Delegation of Authority

Memo To: Radiation Safety Officer

From: Chief Executive Officer

Subject: Delegation of Authority

You, Martin S. Richman, M.S., have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time. It is estimated that you will spend 5 hours per week conducting radiation protection activities.



Signature of Management Representative

3/18/09

Date

I accept the above responsibilities.



Martin S. Richman, M.S.

3/18/09

Date

**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

Martin S. Richman, M.S.

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 (INTRAVASCULAR BRACHYTHERAPY)

**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	UNIVERSITY OF MD, COLUMBIA NUCLEAR ENGINEERING/MEDICAL PHYSICS MS	200	1975-1978
Radiation protection	SAME AS ABOVE	100	1975-1977
Mathematics pertaining to the use and measurement of radioactivity	SAME AS ABOVE, PLUS UNIV. OF MD, COLUMBIA PHYSICS MS	100	1975-1981
Radiation biology	SAME AS ABOVE	50	1976-1977
Radiation dosimetry	SAME AS ABOVE	100	1976-1978

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	NORTH KANSAS CITY HOSPITAL NORTH KANSAS CITY, MO 64116 LICENSE # 24-18628-01	1990-PRESENT
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides	SAME AS ABOVE	1990-PRESENT
Securing and controlling byproduct material	SAME AS ABOVE	1990-PRESENT
Using administrative controls to avoid mistakes in administration of byproduct material	SAME AS ABOVE	1990-PRESENT
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures	SAME AS ABOVE	1990-PRESENT
Using emergency procedures to control byproduct material	SAME AS ABOVE	1990-PRESENT
Disposing of byproduct material	SAME AS ABOVE	1990-PRESENT
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ 35.400 (Cs-137 > 400 mci, Ir-192 > 150 mci, I-125 > 30 mci) 35.600 (Ir-192 > 10 Ci) 35.1000	SAME AS ABOVE	1992-PRESENT OCT 2007-PRESENT 2002-2005

+ 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 KENNETH ARNETT, M.D.	License/Permit Number listing supervising individual as a Radiation Safety Officer 24-18628-01
This license authorizes the following medical uses:	
<input checked="" type="checkbox"/> 35.100	<input checked="" type="checkbox"/> 35.200
<input type="checkbox"/> 35.500	<input checked="" type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input checked="" type="checkbox"/> 35.400
	<input type="checkbox"/> 35.600 (teletherapy)
	<input checked="" type="checkbox"/> 35.1000 (INTRA VASCULAR BRACHYTHERAPY)

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	NORTH KANSAS CITY HOSPITAL NORTH KANSAS CITY, MO 64116 LICENSE # 24-18628-01	JAN-FEB 2009
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	SAME AS ABOVE	JAN-FEB 2009
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	SAME AS ABOVE	1990-PRESENT
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	SAME AS ABOVE	OCTOBER 2007 - PRESENT
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): INTRA VASCULAR BRACHYTHERAPY	SAME AS ABOVE	2002-2005

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

KENNETH ARNETT, M.D., RSO

24-18628-01

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 (INTRA VASCULAR BRACHYTHERAPY)

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 MARTIN S. RICHMAN, M.S. 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 _____ 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 MARTIN S. RICHMAN, M.S. 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:

Sr-90 (IVBT)

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

AND

Third Section
Complete for ALL

I attest that MARTIN S. RICHMAN, M.S. 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 NORTH KANSAS CITY HOSPITAL, NORTH KANSAS CITY, MO 64116
Name of Facility

License/Permit Number: 24-18628-01

Name of Preceptor	Signature	Telephone Number	Date
KENNETH ARNETT, M.D., RSO	<i>Kenneth Arnett</i>	816 691 5201	3-16-2009

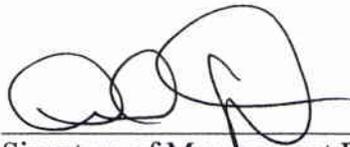
Delegation of Authority

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From: Chief Executive Officer

Subject: Delegation of Authority

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Signature of Management Representative

3/18/09

Date

I accept the above responsibilities.



Martin S. Richman, M.S.

3/18/09

Date

NORTH KANSAS CITY HOSPITAL
ATTN: RADIOLOGY
2800 CLAY EDWARDS DRIVE
NORTH KANSAS CITY, MO 64116-3281

AUTO PRESORTED FIRST-CLASS
604 605 60532 N2-66

PRESORT FIRST-CLASS MAIL
US POSTAGE PAID
KANSAS CITY, MO
PERMIT # 802



4007090323-155115

2

RETURN SERVICE REQUESTED

60532



NUCLEAR REGULATORY COMMISSION REGION III
MATERIALS LICENSING BRANCH
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4252