



RAPID CITY REGIONAL HOSPITAL
Medical Imaging Services

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FAX COVER SHEET
Medical Imaging Services

TO PERSON: Rachel Browder FAX #: 817 860-8263

TO COMPANY: U.S. NRC PHONE #: _____

FROM: Lowell Husman PHONE #: 605 719-8436

DATE: 10/22/2009 NUMBER OF PAGES: 3 (including cover page)

TIME: _____

PLEASE DELIVER

MESSAGE:

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Date: 10/22/09

To: Rachel Browder

Re: Requesting Information concerning remote sites.

We first had a teleconference on the remote sites to our NRC license 40-00238-04 on July 23, 2009. It included you, Jacqueline Cook, Latischa Hanson, Janeen Bucholz, and me. Again on September 1, 2009, you, Jacqueline Cook, and myself again spoke of the different issues with adding remote sites to our license. During both of these conversations, you indicated that you would send a letter detailing our conversation including discussion on the un-written policy of Medical Use Licensees sending radioactive unit doses to their remote sites without changing to a Commercial Radiopharmacy licensee.

I would greatly appreciate the written information on how we can proceed with the establishment of remote sites within our network of facilities. Please send me a letter discussing the different questions we discussed and what we need to do to accomplish our goals. Whether it is an amendment request or simply a letter to you telling you what we are going to do.

First situation: Regional Heart Doctors Clinic. Located 6 blocks south of Rapid City Regional Hospital.

Rapid City Regional Hospital did purchase The Heart Doctors medical clinic and practice. This is now called Regional Heart Doctors. On August 31, 2009, I sent Jacqueline Cook a letter of the pending purchase, as she requested. Is there any other information I need to provide?

The Heart Doctors have had an independent mobile nuclear service, DMS, NRC license number 40-32477-01, performing nuclear procedures at their facility for a few years. The camera is owned by DMS and the technologist is a DMS employee. At least 2 of the cardiologist are Authorized Users on both the DMS and Rapid City Regional Hospital licenses. Latischa Hanson inspected the Heart Doctor's facility on June 26, 2009.

The contract with DMS was changed from the Heart Doctors to Rapid City Regional Hospital with the purchase. The DMS contract will run for another 12 to 14 months. All of the previous Heart Doctor's employees and the doctors have become Rapid City Regional Hospital employees. The Nuclear Medicine Technologist is still a DMS employee under the contract.

We would like to send unit doses to Regional Heart Doctors from Rapid City Regional Hospital's Nuclear Medicine department. We would not be selling these doses to DMS. We would be transferring the cost to Regional Heart Doctors facility for them to bill the patient.

The DMS technologist would be using these unit doses under the Authorized Regional Heart Doctors User under the DMS license.

Can this be done under the un-written policy? What type of amendment request, if any, would I have to provide? If not an amendment request, what should I provide?

In 8 or 10 months when the contract nears termination, we will be requesting an amendment to have Regional Heart Doctors completely a remote under the Rapid City Regional Hospital license. At that time we will install our own equipment and technologists.

Second situation: Queen City Regional Medical Center. Located in Spearfish, South Dakota. Approximately 40 miles northwest of Rapid City, South Dakota.

Sorry, but this situation is more complex. We would like to put a nuclear medicine department into another clinic in our network (Queen City Regional Medical Center) and keep it under our license. We would supply unit doses from Rapid City Regional Hospital Nuclear Medicine Department.

I would like to describe our entire system. If you think it would help, I could send you organization structure / management reporting charts to help explain how everything is connected.

Everything is under Regional Health of which Dr. Charles Hart is the President and CEO. Under Regional Health are 3 entities, Rapid City Regional Hospital, Regional Health Network, and Regional Health Physicians. Tim Sughrue is the COO of Regional Health and CEO of Rapid City Regional Hospital. Dr. James Keegan is the CEO of Regional Health Physicians. Tim Sughrue and Dr. Keegan report directly to Dr. Hart.

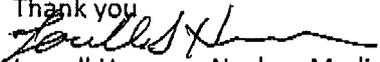
Queen City Regional Medical Center building is under Regional Health Network. Queen City Regional Medical Center employees are part of the Regional Health Physicians. Our NRC license # 40-00238-04 is under Rapid City Regional Hospital.

Different ideas come to mind as to how we can make this work.

1. Amend our license name to Regional Health, doing business as Rapid City Regional Hospital, with a remote site at Queen City Regional Medical Center.
2. Keep the NRC license as is and have Dr. Hart issue a notice or declaration. This notice would authorize the certifying officer and RSO named on the Rapid City Regional Hospital's NRC License, as well as the RCRH RSC to have full authority and responsibility of licensed activity throughout Regional Health at any and all remote sites named on the NRC license.
3. Make the Nuclear Medicine department in Queen City Regional Medical Center part of the Rapid City Regional Hospital Nuclear Medicine department. All employees and equipment involved with Nuclear Medicine would be part of the Rapid City Regional Hospital Nuclear Medicine department.

How can we make this work? Any and all suggestions are greatly appreciated.

Our main concern is to be in full compliance with our NRC license. We have enjoyed a very favorable relationship with the NRC. Other than the 2 level four infractions in our last inspection, we have not had an infraction for many inspections. I know these are very difficult situations that we would like to implement. That is why we are asking for your help before proceeding. Especially, since you have told us of the un-written policy on sending unit doses to remote sites.

Thank you

Lowell Husman, Nuclear Medicine Supervisor
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