

Allergy, Asthma  
& Immunology

Ambulatory Surgery

Audiology

Cardiology

Clinical Research

Dermatology

Endocrinology

Family Medicine

Gastroenterology

General &  
Vascular Surgery

Geriatrics

Internal Medicine

Laboratory

Neurology

Nuclear Medicine

Nutrition

Obstetrics  
& Gynecology

Oncology-Hematology

Ophthalmology

Optometry

Orthopaedic Surgery

Otolaryngology-  
Head & Neck Surgery

Pediatrics

Pediatric Pulmonology

Pharmacy

Physical Medicine  
& Rehabilitation

Podiatry

Radiology

Rheumatology

Speech Pathology

Sports Medicine

Surgery Center

Urology

Vascular Laboratory

March 12, 2010

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

**RE: Amendment to NRC License No. 13-32393-01**  
**The South Bend Clinic**

Dear Sir/Madam:

We would like to amend our current NRC license to reflect the following changes:

**Item #1:** Please remove Thomas Bowers, M.D. as the Radiation Safety Officer (RSO):

**Item #2:** Please list Sharon A. Updike, BA, CNMT as the RSO on our NRC license. She is listed as the RSO on NRC license #13-32478-01 for 35.100 and 35.200. We have enclosed a copy of her previously submitted NRC313A form which documents the required 35.300 training. Also included are the RSO/Executive Management agreement letter and a letter stating the RSO availability.

If you have any questions or require additional information, please contact our physics consultant, Sharon A. Updike, Medical Physics Consultants at 734-662-3197

Sincerely,



Paul Meyer  
Executive Director  
South Bend Clinic

**RECEIVED MAR 17 2010**

Allergy, Asthma  
& Immunology  
Ambulatory Surgery  
Audiology  
Cardiology  
Clinical Research  
Dermatology  
Endocrinology  
Family Medicine  
Gastroenterology  
General &  
Vascular Surgery  
Geriatrics  
Internal Medicine  
Laboratory  
Neurology  
Nuclear Medicine  
Nutrition  
Obstetrics  
& Gynecology  
Oncology-Hematology  
Ophthalmology  
Optometry  
Orthopaedic Surgery  
Otolaryngology-  
Head & Neck Surgery  
Pediatrics  
Pediatric Pulmonology  
Pharmacy  
Physical Medicine  
& Rehabilitation  
Podiatry  
Radiology  
Rheumatology  
Speech Pathology  
Sports Medicine  
Surgery Center  
Urology  
Vascular Laboratory

**RSO / EXECUTIVE MANAGEMENT  
LETTER OF UNDERSTANDING**

March 8, 2010

Sharon A. Updike, BA, CNMT  
The South Bend Clinic  
211 North Eddy Street  
South Bend, IN 46334

**Re: Radiation Safety Officer / Executive Management  
Letter of Understanding**

Dear Sharon A. Updike,

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.

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,

  
Paul Meyer  
Executive Director



Sharon A. Updike, BA, CNMT  
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

Sharon A. Updike, BA, CNMT

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**

- Provide a copy of the board certification.
- Use Table 3.c. to describe training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license.
- 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**

- 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.
- 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	Oregon State University, Corvallis, OR	30	1/08 to 3/09
	WCC, Ann Arbor, MI	10	9/07 to 12/07
	Medical Physics Cons. AU Course, IN	10	4/08
Radiation protection	Oregon State University, Corvallis, OR	50	1/08 to 3/09
	Medical Physics Cons. AU Course, IN	10	4/08
Mathematics pertaining to the use and measurement of radioactivity	Oregon State University, Corvallis, OR	30	1/08 to 3/09
	WCC, Ann Arbor, MI	10	4/06 to 12/07
	Medical Physics Cons. AU Course, IN	5	4/08
Radiation biology	Oregon State University, Corvallis, OR	40	1/08 to 3/09
	Medical Physics Cons. AU Course, IN	10	4/08
Radiation dosimetry	Oregon State University, Corvallis, OR	10	1/08 to 3/09
	Medical Physics Cons. AU Course, IN	5	4/08
Total Hours of Training:		220.0	

## 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	MidMichigan Medical Center/21-01549-02 Advanced PET Imaging Network/1358-1 Medical Physics Consultants, Inc./21-20153-01	4/06 to 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	MidMichigan Medical Center/21-01549-02 Advanced PET Imaging Network/1358-1 Medical Physics Consultants, Inc./21-20153-01	4/06 to present
Securing and controlling byproduct material	MidMichigan Medical Center/21-01549-02 Advanced PET Imaging Network/1358-1 Medical Physics Consultants, Inc./21-20153-01	4/06 to present
Using administrative controls to avoid mistakes in administration of byproduct material	MidMichigan Medical Center/21-01549-02 Advanced PET Imaging Network/1358-1 Medical Physics Consultants, Inc./21-20153-01	4/06 to present
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures	MidMichigan Medical Center/21-01549-02 Advanced PET Imaging Network/1358-1 Medical Physics Consultants, Inc./21-20153-01	4/06 to present
Using emergency procedures to control byproduct material	MidMichigan Medical Center/21-01549-02 Advanced PET Imaging Network/1358-1 Medical Physics Consultants, Inc./21-20153-01	4/06 to present
Disposing of byproduct material	MidMichigan Medical Center/21-01549-02 Advanced PET Imaging Network/1358-1 Medical Physics Consultants, Inc./21-20153-01	4/06 to present
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ 35.100, 35.200, 35.300    	MidMichigan Medical Center/21-01549-02 Advanced PET Imaging Network/1358-1 Medical Physics Consultants, Inc./21-20153-01	4/06 to present

+ Choose all applicable sections of 10 CFR Part 35 to describe radiolotopes 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  <b>James M. Botti, M.S.</b>	License/Permit Number listing supervising individual as a Radiation Safety Officer  <p style="text-align: center;"><b>21-01190-05</b></p>
This license authorizes the following medical uses: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.100</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.200</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.300</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.400</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.500</div> <div style="width: 33%;"><input checked="" type="checkbox"/> 35.600 (remote afterloader)</div> <div style="width: 33%;"><input type="checkbox"/> 35.600 (teletherapy)</div> <div style="width: 33%;"><input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)</div> <div style="width: 33%;"><input type="checkbox"/> 35.1000 ( _____ )</div> </div>	

**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	<b>James M. Botti, M.S.</b>	<b>4/06 to present</b>
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	<b>James M. Botti, M.S.</b>	<b>4/06 to present</b>
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses		
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><small>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.)</small></p> <p><b>James M. Botti, M.S.</b></p>	<p>License/Permit Number listing supervising individual</p> <p style="text-align: center;"><b>21-01190-05</b></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  <input type="checkbox"/> Authorized Medical Physicist         </p> <p>Authorized as RSO, AU, ANP, or AMP for the following medical uses:</p> <table style="width: 100%;"> <tr> <td><input checked="" type="checkbox"/> 35.100</td> <td><input checked="" type="checkbox"/> 35.200</td> <td><input checked="" type="checkbox"/> 35.300</td> <td><input type="checkbox"/> 35.400</td> </tr> <tr> <td><input checked="" type="checkbox"/> 35.500</td> <td><input checked="" type="checkbox"/> 35.600 (remote afterloader)</td> <td colspan="2"><input type="checkbox"/> 35.600 (teletherapy)</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)</td> <td colspan="2"><input type="checkbox"/> 35.1000 ( _____ )</td> </tr> </table>		<input checked="" type="checkbox"/> 35.100	<input checked="" type="checkbox"/> 35.200	<input checked="" type="checkbox"/> 35.300	<input type="checkbox"/> 35.400	<input checked="" type="checkbox"/> 35.500	<input checked="" 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 ( _____ )	
<input checked="" type="checkbox"/> 35.100	<input checked="" type="checkbox"/> 35.200	<input checked="" type="checkbox"/> 35.300	<input type="checkbox"/> 35.400										
<input checked="" type="checkbox"/> 35.500	<input checked="" 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 ( _____ )											

- 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 **Sharon A. Updike** 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 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 **Sharon A. Updike** 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 Sharon A. Updike 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 St. John Macomb Oakland Hospital  
Name of Facility

License/Permit Number: NRC License 21-01190-05

Name of Preceptor  
**James M. Botti, M.S.**

Signature  


Telephone Number  
**(734) 662-3197**

Date  
**04/01/2009**





March 8, 2010

**United States Nuclear Regulatory Commission**

Region III, Office of Materials Licensing  
2443 Warrenville Road  
Suite 210  
Lisle, IL 60532-4352

RE: RSO Availability and Ability to Perform Duties

To Whom It May Concern:

Please find the information listed below concerning my availability and ability to perform RSO duties at this facility.

**Item #1:** My position at Medical Physics Consultants allows me adequate time and flexibility to address both my contractual and regulatory obligations to any facility that I am listed as the Radiation Safety Officer.

The position of Radiation Safety Officer is what we are contracted for by these facilities. All facilities have a signed contract by both them and Medical Physics Consultants. These contracts clearly outline both my responsibilities and the facilities. All facilities have also signed a RSO / Management Agreement form which has been forwarded to the NRC in all applications and / or amendments.

All facilities are audited on a quarterly basis which is standard of practice. These audits are forwarded to both management and the supervising technologist. These audits are reviewed and signed by both of these individuals. Any items that require attention are documented by the supervising technologist.

**Item #2:** The amount of time for me to respond to an emergency involving radioactive material will vary depending upon my activities that day. Typically I would be able to respond immediately by phone. All facilities have both my cell phone and office phone numbers. The office staff at Medical Physics Consultants has a copy of my daily schedule at all times. The staff has phone numbers to any location that I might be working.

Medical Physics Consultants has an answering service that operates 24 hours a day, 7 days a week, 365 days a year. They have phone numbers for my home, cell and office. If for some reason they are not able to contact me, they have a list of other physicists that are employed by Medical Physics Consultants to contact. These individuals are board certified physicists with a great deal of expertise. This same mechanism has been in place for years whenever one of our facilities is in need of immediate expertise and advice. If we are contacted for a radiological emergency we direct the account to notify the appropriate management individual.

---

2309 Shelby Avenue  
Ann Arbor, MI 48103  
(734) 662-9224 Fax  
(734) 662-3197



70 E. 91st Street, Suite 106  
Indianapolis, IN 46240  
(317) 581-1931 Fax  
(317) 581-1911



4806 Mile High Drive  
Salt Lake City, UT 84124  
(801) 272-2952 Office & Fax



N7375 Crystal Ridge Drive  
Beaver Dam, WI 53916  
(920) 885-9872 Fax  
(920) 885-9870

As stated earlier we audit the program quarterly, any unsafe practices or incidents are reported to management in writing. Items of significant concern are always reported to management verbally in addition to the written documentation.

**Item #3:** The amount of time that I will spend at this facility will vary. Time will depend upon the status of the Radiation Protection Program and other variables. As stated above quarterly reports are sent to management.

**Item #4:** All individuals who handle or have access to radioactive material are overseen by a supervisor. These supervisors reports directly to management and the Radiation Safety Officer. All individuals are in-serviced yearly. Management in their license application have committed to supplying the necessary resources for these individuals to achieve regulatory compliance. Additionally, they have committed to this in the RSO / Management Agreement letter.

If you have any questions or if I may be of assistance, please contact me by phone at (734) 662-3197 or by e-mail at [supdike@mpcphysics.com](mailto:supdike@mpcphysics.com).

Respectfully Yours,

A handwritten signature in cursive script, appearing to read "Sharon Updike".

Sharon Updike, BA, CNMT  
Medical Physics Consultant

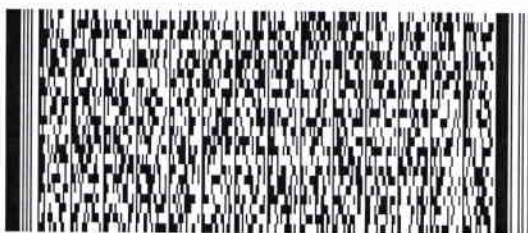
From: Origin ID: SBNA (574) 237-9315  
NUCLEAR MEDICINE  
SOUTH BEND CLINIC & SURGERICENTER  
211 NORTH EDDY STREET

SOUTH BEND, IN 46617



J10101002220224

SHIP TO: (574) 237-9315 BILL SENDER  
**OFFICE OF MATERIALS & LICENSING**  
**U.S. NUCLEAR REGULATORY COMMISSION**  
**2443 WARRENVILLE RD**  
**REGION 111 - SUITE 210**  
**LISLE, IL 60532**



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