

U. S. Nuclear Regulatory Commission  
Region III  
2443 Warrenville Road, Ste. 210  
Lisle, IL 60532-4352  
Attn: Nuclear Materials Safety and Safeguards Division  
Materials Licensing Branch

April 8, 2010

**Re: License No.: 24-13383-01  
Christian Hospital  
11133 Dunn Road  
St. Louis, MO 63136**

**Please reference: Control # 318727**

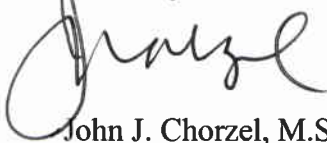
To Whom It May Concern:

We wish to amend NRC License 24-13383-01 as follows:

- 1) Add Veena D. Divecha, M.D, as an authorized user for 10 CFR 35 part 400. Dr. Divecha's supporting documentation (ABR Certification, NRC Form 313A(AUS), Preceptor License information (Univ of Kansas Hospital) are enclosed.

Should there be any further needed information or clarification, please direct questions to our Medical Physicist, John J. Chorzel, M.S., DABR, at 314-653-5810.

Sincerely,



John J. Chorzel, M.S., DABR  
Medical Physicist/Radiation Safety Officer  
Christian Hospital

RECEIVED APR 19 2010

**AUTHORIZED USER TRAINING AND EXPERIENCE  
AND PRECEPTOR ATTESTATION**  
(for uses defined under 35.400 and 35.600)  
[10 CFR 35.490, 35.491, and 35.690]

APPROVED BY OMB: NO. 3150-0120  
EXPIRES: 3/31/2012

Name of Proposed Authorized User

State or Territory Where Licensed

Veena D. Divecha, M.D.

Missouri

- Requested Authorization(s) (check all that apply)
- 35.400 Manual brachytherapy sources
  - 35.600 Teletherapy unit(s)
  - 35.400 Ophthalmic use of strontium-90
  - 35.600 Gamma stereotactic radiosurgery unit(s)
  - 35.600 Remote afterloader unit(s)

**PART I -- TRAINING AND EXPERIENCE**  
(Select one of the three 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. For 35.600, go to the table in 3.e. and describe training provider and dates of training for each type of use for which authorization is sought.
- c. Skip to and complete Part II Preceptor Attestation.

**2. Current 35.600 Authorized User Requesting Additional Authorization for 35.600 Use(s) Checked Above**

- a. Go to the table in section 3.e. to document training for new device.
- b. Skip to and complete Part II Preceptor Attestation.

**3. Training and Experience for Proposed Authorized User**

- a. Classroom and Laboratory Training  35.490  35.491  35.690

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			
<b>Total Hours of Training:</b>			

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

**3. Training and Experience for Proposed Authorized User (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 Experience/License or Permit Number of Facility	Confirm	Dates of Experience*
Ordering, receiving, and unpacking radioactive materials safely and performing the related radiation surveys		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Checking survey meters for proper operation		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Preparing, implanting, and safely removing brachytherapy sources		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Maintaining running inventories of material on hand		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Using administrative controls to prevent a medical event involving the use of byproduct material		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Using emergency procedures to control byproduct material		<input type="checkbox"/> Yes <input type="checkbox"/> No	

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*
<b>Approved by:</b> <input type="checkbox"/> Residency Review Committee for Radiation Oncology of the ACGME <input type="checkbox"/> Royal College of Physicians and Surgeons of Canada <input type="checkbox"/> Committee on Postdoctoral Training of the American Osteopathic Association		

Supervising Individual	License/Permit Number listing supervising individual as an Authorized User
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**AUTHORIZED USER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)**

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

**c. Supervised Clinical Experience for 10 CFR 35.491**

Description of Experience	Location of Experience/License or Permit Number of Facility	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 listing supervising individual as an Authorized User	

**d. Supervised Work and Clinical Experience for 10 CFR 35.690**

- Remote afterloader unit(s)     
  Teletherapy unit(s)     
  Gamma stereotactic radiosurgery unit(s)

Supervised Work Experience		Total Hours of Experience:	
Description of Experience Must Include:	Location of Experience/License or Permit Number of Facility	Confirm	Dates of Experience*
Reviewing full calibration measurements and periodic spot-checks		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Preparing treatment plans and calculating treatment doses and times		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Using administrative controls to prevent a medical event involving the use of byproduct material		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Implementing emergency procedures to be followed in the event of the abnormal operation of the medical unit or console		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Checking and using survey meters		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Selecting the proper dose and how it is to be administered		<input type="checkbox"/> Yes <input type="checkbox"/> No	

**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*
<b>Approved by:</b> <input type="checkbox"/> Residency Review Committee for Radiation Oncology of the ACGME <input type="checkbox"/> Royal College of Physicians and Surgeons of Canada <input type="checkbox"/> Committee on Postdoctoral Training of the American Osteopathic Association		
Supervising Individual		License/Permit Number listing supervising individual as an Authorized User

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			
Safety procedures for the device use			
Clinical use of the device			
Supervising Individual. <i>If training provided by Supervising Individual (if more than one supervising individual is necessary to document supervised work experience, provide multiple copies of this page.)</i>		License/Permit Number listing supervising individual as an Authorized User	
Authorized for the following types of use: <input type="checkbox"/> Remote afterloader unit(s) <input type="checkbox"/> Teletherapy unit(s) <input type="checkbox"/> Gamma stereotactic radiosurgery unit(s)			

f. Provide completed Part II Preceptor Attestation.

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

**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.

By checking the boxes below, the preceptor is attesting that the individual has knowledge to fulfill the duties of the position sought and not attesting to the individual's "general clinical competency."

**First Section**

Check one of the following for each requested authorization:

**For 35.490:**

**Board Certification**

I attest that Veena D. Divecha, M.D. has satisfactorily completed the requirements in  
Name of Proposed Authorized User

35.490(a)(1) and has achieved a level of competency sufficient to function independently as an authorized user of manual brachytherapy sources for the medical uses authorized under 10 CFR 35.400.

**OR**

**Training and Experience**

I attest that \_\_\_\_\_ has satisfactorily completed the 200 hours of  
Name of Proposed Authorized User

classroom and laboratory training, 500 hours of supervised work experience, and 3 years of supervised clinical experience in radiation oncology, as required by 10 CFR 35.490(b)(1) and (b)(2), and has achieved a level of competency sufficient to function independently as an authorized user of manual brachytherapy sources for the medical uses authorized under 10 CFR 35.400.

**For 35.491:**

I attest that \_\_\_\_\_ has satisfactorily completed the 24 hours of  
Name of Proposed Authorized User

classroom and laboratory training applicable to the medical use of strontium-90 for ophthalmic radiotherapy, has used strontium-90 for ophthalmic treatment of 5 individuals, as required by 10 CFR 35.491(b), and has achieved a level of competency sufficient to function independently as an authorized user of strontium-90 for ophthalmic use.

**Second Section**

**For 35.690:**

**Board Certification**

I attest that \_\_\_\_\_ has satisfactorily completed the requirements in  
Name of Proposed Authorized User

35.690(a)(1).

**OR**

**Training and Experience**

I attest that \_\_\_\_\_ has satisfactorily completed 200 hours of classroom  
Name of Proposed Authorized User

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**

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

**Preceptor Attestation (continued)**

**Third Section**

**For 35.690: (continued)**

I attest that \_\_\_\_\_ has received training required in 35.690(c) for device  
Name of Proposed Authorized User  
 operation, safety procedures, and clinical use for the type(s) of use for which authorization is sought, as checked below.  
 Remote afterloader unit(s)     Teletherapy unit(s)     Gamma stereotactic radiosurgery unit(s)

**AND**

**Fourth Section**

I attest that \_\_\_\_\_ has achieved a level of competency sufficient to  
Name of Proposed Authorized User  
 achieve a level of competency sufficient to function independently as an authorized user for:  
 Remote afterloader unit(s)     Teletherapy unit(s)     Gamma stereotactic radiosurgery unit(s)

**Fifth Section**

**Complete the following for preceptor attestation and signature:**

- I meet the requirements in 10 CFR 35.490, 35.491, 35.690, or equivalent Agreement State requirements, as an authorized user for:
  - 35.400 Manual brachytherapy sources     35.600 Teletherapy unit(s)
  - 35.400 Ophthalmic use of strontium-90     35.600 Gamma stereotactic radiosurgery unit(s)
  - 35.600 Remote afterloader unit(s)

Name of Preceptor Eashwer Reddy, M.D.	Signature <i>Eashwer Reddy</i>	Telephone Number (913) 588-3610	Date 03/22/2010
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License/Permit Number/Facility Name  
 University of Kansas Hospital Authority #18-C801  
 (State of Kansas)

# THE UNIVERSITY OF KANSAS HOSPITAL

Environment of Care Department

April 8, 2010

**TO:** Eashwer Reddy, MD  
Radiation Oncology

**FROM:** Ruth Schukman-Dakotas  
Radiation Safety Officer



**RE:** Authorized User Status

I am writing this letter to confirm that you are an Authorized User of Radioactive Materials under the conditions of the broad scope, radioactive materials license 18-C801 issued by the State of Kansas to the University of Kansas Hospital.

You are authorized for the following radioactive material use:

- 10 CFR 35.300 Use of unsealed byproduct material for which a written directive is required ( $^{32}\text{P}$  and  $^{90}\text{Y}$ ).
- 10 CFR 35.400 Use of sources for manual brachytherapy
- 10 CFR 35.500 Use of sealed sources for diagnosis.
- 10 CFR 35.600 Use of a sealed source in a remote afterloader unit, teletherapy unit, or gamma stereotactic radiosurgery unit.

If you have any questions, please contact me at extension 8-1713 or [rschukma@kumc.edu](mailto:rschukma@kumc.edu).



# 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 Radiation Oncology, the Association of  
University Radiologists, and the American Association of Physicians in Medicine  
Hereby certifies that

**Veena D. Diwecha, MB, BS**

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 third day of June, 2009

Thereby demonstrating to the satisfaction of the Board  
that she is qualified to practice the specialty of

**Radiation Oncology**

AH Eligible



Certificate No. 46877

*N. Reed Gunnick, MD*  
President

*Richard T. Moran*  
Secretary-Treasurer

*Hayden Edwards*  
Executive Director



Valid through 2019

John J. Chorzel, M.S., DABR  
Christian Hospital NE  
Dept. of Radiation Oncology  
11155 Dunn Road, Ste. 101E  
St. Louis, MO 63136

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FIRST CLASS



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USNRC  
Region III  
2443 Warrenville Road, Ste. 210  
Lisle, IL 60532-4352  
Attn: Nuclear Materials Safety and Safeguards Division  
Materials Licensing Branch  
*re: Control # 318727*

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