

June 5, 2010

Colleen Casey
Nuclear Regulatory Commission Region III
Materials Licensing Branch, Suite 210
2443 Warrenville Road
Lisle, Illinois 60532-4352

Re: NRC Material's License Number 24-18628-01

Dear Colleen,

Thanks for your incredible response and support to expedite this urgent request to amend our materials license to add me as AMP for 35.600 remote after loader procedures.

The attachments are:

1. Letter from Matt Foresman, Vice President North Kansas City Hospital, explaining circumstances surrounding urgent request along with statements about my experience and previous standing as IVBT physicist and RSO.
2. Letter from Ashoka Bhargava, M.S, AMP, Preceptor.
3. Completed NRC form 313(AMP) with Mr. Bhargava's signature.

On the attached NRC form 313(AMP) I have added information concerning location/dates of training and experience (page 2) for the top three items under the heading labeled "Description of Training/Experience" even though Ashoka Bhargava was my preceptor for the bottom two items covering the remote afterloading unit. This information on external beam training and experience was first supplied at the time I was approved to be the hospital's Intravascular Brachytherapy Physicist (license amendment 25, August 31, 2001) along with a letter from the physicist who supervised my original training. If you would like this separated out along with a copy of this letter I would be happy to fax it.

Let me know how else I may help.

Sincerely,

Marty Richman
Martin S. Richman
Radiation Safety officer
2800 Clay Edwards Dr
North Kansas City Hospital
North Kansas City MO 64116
816 691 5343 (Radiation Oncology)
816 346 7869 (fax)
913 706 9200 (cell)



2800 Clay Edwards Drive
North Kansas City, MO
64116-3220

(816) 691-2000
www.nkch.org

June 4, 2010

Colleen Casey
Nuclear Regulatory Commission Region III
Materials Licensing Branch, Suite 210
2443 Warrenville Road
Lisle, Illinois 60532-4352

Re: NRC Material's License number ~~24-18628-01~~

Dear Ms. Casey,

We are requesting an urgent review of the attached requested authorization to approve Martin S. Richman, M.S., Medical Physicist, to be our Authorized Medical Physicist for the medical use of a high dose rate Iridium-192 remote afterloader.

This urgency is related to beginning a patient's treatment by a MammoSite procedure on June 10, 2010. Our normal AMP will be unavailable and no other option is available to reschedule the patient. We would be tremendously grateful for a decision by Wednesday, June 9, 2010.

Mr. Richman has been North Kansas City Hospital's full time therapy physicist since 1990. He is listed as the Radiation Safety Officer on our license and also as (through amendment No. 35) as the Intravascular Brachytherapy Physicist (through amendment No. 35). Mr. Richman informed me that the use of his standing as an IVBT AMP in support of this amendment request had been previously discussed with you. Mr. Richman has had continuous training and experience with a GammaMedPlus HDR remote afterloader unit since October 2007. A completed NRC Form 313A (AMP) signed by Mr. Richman's preceptor, Ashoka Bhargava, M.S is attached.

Telephone numbers are:
816 691 5343 Radiation Oncology
816 346 7869 (Fax)
913 703 9200 (Martin Richman's cell)

Sincerely,

A handwritten signature in black ink that reads "Matt Foresman".

Matt Foresman
Vice President - Professional Services

Enclosure

June 5, 2010

Colleen Casey
Nuclear Regulatory Commission Region III
Materials Licensing Branch, Suite 210
2443 Warrenville Road
Lisle, Illinois 60532-4352

Re: NRC Material's License Number 24-18628-01

Dear Ms. Casey,

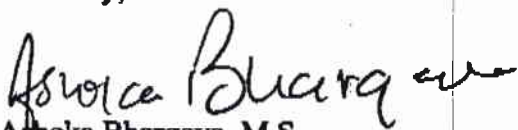
Martin S. Richman has been under my supervision for all clinical cases using Iridium-192 for high dose rate therapy with the GammaMedPlus remote afterloading unit since the unit was installed in October 2007. He has also performed numerous calibrations, spot checks, surveys, safety training and source inventories. Further, he has demonstrated successful hands on device operation and patient treatment planning. All of this training and experience has been under my continuous supervision from October 2007 to the present time.

I consider him to be very capable of continuing and sustaining all clinical operations involving high dose rate radiation therapy as an Authorized Medical Physicist.

I am an Authorized Medical physicist for 35.600 remote afterloader listed on North Kansas City Hospital's NRC material license # 24-18628-01.

Please do not hesitate to contact me if you have further questions.

Sincerely,



Ashoka Bhargava, M.S.
Authorized Medical Physicist
2800 Clay Edwards Dr
North Kansas City Hospital
North Kansas City MO 64116
816 691 5343

NRC FORM 313A (AMP)
 (3-2008)

U.S. NUCLEAR REGULATORY COMMISSION

**AUTHORIZED MEDICAL PHYSICIST TRAINING AND EXPERIENCE
 AND PRECEPTOR ATTESTATION
 [10 CFR 35.51]**

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

Name of Proposed Authorized Medical Physicist

- Requested Authorization(s) (check all that apply)
- 35.400 Ophthalmic use of strontium-90
 - 35.600 Teletherapy unit(s)
 - 35.600 Remote afterloader unit(s)
 - 35.600 Gamma stereotactic radiosurgery 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. Go to the table in 3.c. 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 Authorized Medical Physicist Seeking Additional Authorization for use(s) checked above**
 - a. Go to the table in section 3.c. to document training for new device.
 - b. Skip to and complete Part II Preceptor Attestation
- 3. Education, Training, and Experience for Proposed Authorized Medical Physicist**
 - a. Education: Document master's or doctor's degree in physics, medical physics, other physical science, engineering, or applied mathematics from an accredited college or university.

Degree	Major Field
1. Master's Degree; 2. Master's Degree	1. Nuclear Engineering 1976; 2. Physics 1981
College or University	
1. University Of Missouri, Columbia MO; 2. University Of Missouri, Columbia MO	

- b. Supervised Full-Time Medical Physics Training and Work Experience in clinical radiation facilities that provide high-energy external beam therapy (photons and electrons with energies greater than or equal to 1 million electron volts) and brachytherapy services.

Yes. Completed 1 year of full-time training in medical physics (for areas identified below) under the supervision of Asheka Bhargava, M.S who meets the requirements for an Authorized Medical Physicist.

AND

Yes. Completed 1 year of full-time work experience in medical physics (for areas identified below) under the supervision of Asheka Bhargava, M.S who meets the requirements for an Authorized Medical Physicist.

NRC FORM 313A (AMP)
 (3-2008)

U.S. NUCLEAR REGULATORY COMMISSION

AUTHORIZED MEDICAL PHYSICIST TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Education, Training, and Experience for Proposed Authorized Medical Physicist (continued)

b. Supervised Full-Time Medical Physics Training and Work Experience (continued)

If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.

Description of Training/ Experience	Location of Training/License or Permit Number of Training Facility/Medical Devices Used+	Dates of Training*	Dates of Work Experience*
Medical Physics	TRAINING Ellis Fischel Cancer Ctr Columbia, MO # 24-00484-04 WORK EXPERIENCE North Kansas City Hosp North Kansas City, MO #24-18628-01 Varian Linear Accelerators	Original med phys training: 1976-1979	1990 to present
Performing sealed source leak tests and inventories	TRAINING Ellis Fischel Cancer Ctr Columbia, MO # 24-00484-04 WORK EXPERIENCE North Kansas City Hosp North Kansas City, MO #24-18628-01 Cs-137, Ir-192, Pd-103, Sr 90	Original med phys training: 1976-1979	1990 to present
Performing decay corrections	TRAINING Ellis Fischel Cancer Ctr Columbia, MO # 24-00484-04 WORK EXPERIENCE North Kansas City Hosp North Kansas City, MO #24-18628-01 Cs-137, Ir-192, Pd-103, Sr 90	Original med phys training: 1976-1979	1990 to present
Performing full calibration and periodic spot checks of external beam treatment unit(s)	TRAINING Ellis Fischel Cancer Ctr Columbia, MO # 24-00484-04 WORK EXPERIENCE North Kansas City Hosp North Kansas City, MO #24-18628-01 Varian Linear Accelerators	Original med phys training: 1976-1979	1990 to present
Performing full calibration and periodic spot checks of stereotactic radiosurgery unit(s)	N/A	N/A	N/A
Performing full calibration and periodic spot checks of remote afterloading unit(s)	North Kansas City Hospital 2800 Clay Edwards Dr. North Kansas city, MO 64116 [GammaMedPlus remote afterloader] / License # 24-18628-01	October 2007 to October 2008	November 2008 to June 2010
Conducting radiation surveys around external beam treatment unit(s), stereotactic radiosurgery unit(s), remote after loading unit(s)	North Kansas City Hospital 2800 Clay Edwards Dr. North Kansas city, MO 64116 / License # 24-18628-01 [GammaMedPlus remote afterloader]	October 2007 to October 2008	November 2008 to June 2010

Supervising Individual**
 Ashoka Bhargava (for remote after loading unit) License/Permit Number listing supervising individual as an authorized Medical Physicist License # 24-18628-01

for the following types of use:
 Remote afterloader unit(s) Teletherapy unit(s) Gamma stereotactic radiosurgery unit(s)

+ Training and work experience must be conducted in clinical radiation facilities that provide high-energy external beam therapy (photons and electrons with energies greater than or equal to 1 million electron volts) and brachytherapy services.
 * 1 year of Full-time medical physics training and 1 year of full time work experience cannot be concurrent.
 ** If the supervising medical physicist is not an authorized medical physicist, the licensee must submit evidence that the supervising medical physicist meets the training and experience requirements in 10 CFR 35.51 and 35.59 for the types of use for which the individual is seeking authorization.

NRC FORM 313A (AMP)
 (9-2009)

U.S. NUCLEAR REGULATORY COMMISSION

AUTHORIZED MEDICAL PHYSICIST TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

3. Education, Training, and Experience for Proposed Authorized Medical Physicist (continued)

c. 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
Hands-on device operation	North Kansas City Hospital 2800 Clay Edwards Dr. North Kansas city, MO 64116 [October 2007 - October 2008]		
Safety procedures for the device use	North Kansas City Hospital 2800 Clay Edwards Dr. North Kansas city, MO 64116 [October 2007 - October 2008]		
Clinical use of the device	North Kansas City Hospital 2800 Clay Edwards Dr. North Kansas city, MO 64116 [October 2007 - October 2008]		
Treatment planning system operation	North Kansas City Hospital 2800 Clay Edwards Dr. North Kansas city, MO 64116 [October 2007 - October 2008]		

Supervising Individual
 If training is provided by Supervising Medical Physicist, (if more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.)

Ashoka Bhargava

License/Permit Number listing supervising individual as an authorized Medical Physicist

License # 28-18628-01

for the following types of use:

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

If Applicable:

Authorization Sought	Device	Training Provided By	Dates of Training
35.400 Ophthalmic Use of strontium-90			

d. Skip to and complete Part II Preceptor Attestation.

NRC FORM 313A (AMP)
(3-2009)

U.S. NUCLEAR REGULATORY COMMISSION

AUTHORIZED MEDICAL PHYSICIST 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.

First Section

Check one of the following:

1. Board Certification

I attest that _____ has satisfactorily completed the requirements in
Name of Proposed Authorized Medical Physicist
10 CFR 35.51(a)(1) and (a)(2).

OR

2. Education, Training, and Experience

I attest that Martin S. Richman, M.S. has satisfactorily completed the 1-year of full-time
Name of Proposed Authorized Medical Physicist
training in medical physics and an additional year of full-time work experience as required by 10 CFR 35.51(b)(1).

AND

Second Section

Complete the following:

I attest that Martin S. Richman, M.S. has training for the types of use for which authorization
Name of Proposed Authorized Medical Physicist
is sought that include hands-on device operation, safety procedures, clinical use, and the operation of a treatment planning system.

AND

Third Section

Complete the following:

I attest that Martin S. Richman, M.S. has achieved a level of competency sufficient to
Name of Proposed Authorized Medical Physicist
function independently as an Authorized Medical Physicist for the following:

- 35.400 Ophthalmic use of strontium-90
- 35.600 Teletherapy unit(s)
- 35.600 Remote afterloader unit(s)
- 35.600 Gamma stereotactic radiosurgery unit(s)

AND

Fourth Section

Complete the following for preceptor attestation and signature:

I meet the requirements in 10 CFR 35.51, or equivalent Agreement State requirements for Authorized Medical Physicist for the following:

- 35.400 Ophthalmic use of strontium-90
- 35.600 Teletherapy unit(s)
- 35.600 Remote afterloader unit(s)
- 35.600 Gamma stereotactic radiosurgery unit(s)

Name of Preceptor <u>Ashoka Bhargava, M.S.</u>	Signature <u>Ashoka Bhargava</u>	Telephone Number (816) 728-2144	Date 6/5/10
License/Permit Number/Facility Name <u>License # 24-18628-01/North Kansas City Hospital</u>			

