

September 27, 2010

- To: Materials Licensing Branch US Nuclear Regulatory Commission Region III 2443 Warrensville Road, Suite 210 Lisle, IL 60532-4352
- From: Christopher Moore ARRT (R), NMTCB Radiation Safety Officer, Nuclear Medicine Department Liberty Hospital 2525 Glenn Hendren Drive Liberty, MO. 64068
- RE: License Number 24-16178-01

Dear License Reviewer:

We wish to renew our Radioactive Materials License #2416178-01 in its entirety.

According to instructions received we have reviewed all of the items in Checklist C and Found them to be in conformance with our present practice. We wish to renew our license as it currently exists with one exception. We wish to remove the authorization for the depleted uranium; these shields have been returned to the vendor as we no longer use them. If there are any questions concerning this application please contact me at 816-415-7791.

Thank you for your assistance in this matter.

Sincerely, More

Christopher Moore

Hospital offical

NRC FORM 313 U.S. NUCLEAR REGULATORY COMMISSIO	N APPROVED BY OMB: NO. 3150-0120 EXPIRES: 3/31/2012
(3-2009) 10 CFR 30, 32, 33,	EXT INES. 5/5/1/2012
34, 35, 36, 39, and 40	Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is unable and the decrement of the application.
	qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services
	Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 2055-0001, or by internet e-mail to infocollects resource@nrc.gov, and to the Desk Officer, Office of Information and Regulations (Keize, NCOC 2000 Conc.gov), and to the Desk Officer, Office of
APPLICATION FOR MATERIALS LICENSE	or by internet e-mail to infocollects resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs NEOR-10202 (3150-0120) Office of Management
	Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information
	collection does not display a currently valid OME control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information
	collection.
INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION	
SEND TWO COPIES OF THE ENTIRE COMPLETED	SUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.
APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:	IF YOU ARE LOCATED IN:
OFFICE OF FEDERAL & STATE MATERIALS AND ENVIRONMENTAL MANAGEMENT PROGRAMS	ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:
DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS U.S. NUCLEAR REGULATORY COMMISSION	
WASHINGTON, DC 20555-0001	
	MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION 111
ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:	2443 WARRENVILLE ROAD, SUITE 210 LISLE, IL 60532-4352
IF YOU ARE LOCATED IN:	
ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY,	ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH
NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH	DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS
CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:	UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:
LICENSING ASSISTANCE TEAM DIVISION OF NUCLEAR MATERIALS SAFETY	NUCLEAR MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
U.S. NUCLEAR REGULATORY COMMISSION, REGION I 475 ALLENDALE ROAD	612 E. LAMAR BOULEVARD, SUITE 400
4/5 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1415	ARLINGTON, TX 76011-4125
PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLE	
MATERIAL IN STATES SUBJECT TO U.S.NUCLEAR REGULATORY COMMISSION JURISDIN	TIONS.
1. THIS IS AN APPLICATION FOR (Check appropriate item)	2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)
A. NEW LICENSE	Liberty Hospital
	Nuclear Medicine Department
B. AMENDMENT TO LICENSE NUMBER	2525 Glenn W. Hendren Drive
C. RENEWAL OF LICENSE NUMBER 24-16178-01	
3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED	Liberty, MO 64069-1002
	4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION
Liberty Hospital	Christopher Moore,
Nuclear Medicine Department	
2525 Glenn W. Hendren Drive	TELEPHONE NUMBER 816-415-7791
Liberty, MO 64069-1002	510 113 7751
• *	
SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORM	ATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.
<ol> <li>RADIOACTIVE MATERIAL</li> <li>a. Element and mass number; b. chemical and/or physical form; and c. maiximum amount</li> </ol>	6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.
which will be possessed at any one time.	
<ol> <li>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.</li> </ol>	8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.
9. FACILITIES AND EQUIPMENT.	10. RADIATION SAFETY PROGRAM.
11. WASTE MANAGEMENT.	12. LICENSE FEES (See 10 CFR 170 and Section 170.31)
	FEE CATEGORT ENCLOSED
<ol> <li>CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS TH UPON THE APPLICANT.</li> </ol>	AT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING
	THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN
CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 3- CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.	I, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTANED HEREIN IS TRUE AND
WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A C	RIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO
ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN	
CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE	SIGNATURE H DATE G-27-10
Christopher Moore 250	
	COMMENTS
APPROVED BY DATE	

NRC FORM 313 (3-2009)

PRINTED ON RECYCLED PAPER

## **License Application Checklists**

This Appendix contains checklists that may be used to assist in organizing an application. It addresses information a medical use licensee needs to provide for authorization to produce PET radioactive drugs for noncommercial transfer to consortium members. See Appendix AA for additional information.

Table C.1, Applicability Table, may be used to determine if particular information must be provided or if "N/A" (not applicable) may be the response to each item that follows. To determine those items to which applicants must respond, "highlight" the columns under the categories of materials requested in Item 5 (e.g., 10 CFR 35.300, 35.400). If any "Y" beside an item is highlighted, applicants must provide detailed information in response to that item. If the letters "N/A" are highlighted, applicants may respond "N/A" on their applications. If any "N" beside an item is highlighted, no information in response is required, but NRC regulations that apply to the given category apply to that type of license. If any "P" beside an item is highlighted, applicants should provide a commitment as described in the section referenced in the body of this document. If any "G" beside an item is highlighted, see subsequent sections for required responses. "APP" indicates that this document contains an appendix that addresses the item.

Section #		ble C.1					· · · · · · · · · · · · · · · · · · ·	
8.5	Topic	35.100/200	35.300	35.400	35.500	35.600	35.1000	APP
0.0	Unsealed Byproduct Material – Uptake,	Y					· .	
	Dilution, Excretion,					22	1.000	
	Imaging, and Localization		÷					
	Studies					. 99	1.00	
8.5	Unsealed Byproduct		Y			12.5	e %)	
	Material - Written							
	Directive Required							
8.5	Manual Brachytherapy			Y				
8.5	Sealed Sources for Diagnosis				Y		:	
8.5	Teletherapy Units					· · · Y · ·		· ·
8.5	Remote Afterloader Units					Y		
8.5	Gamma Stereotactic					Y	1	
	Radiosurgery Units					N 1 1		{
8.5	Other Medical Uses		·				Y	1
8.6	Sealed Sources and	'N	Ń	Y	Y	Y	Y	
	Devices							
8.7	Discrete Source of	Y.	Y	N'	N	N	··Y	
	Ra-226 (Other than sealed						· · ·	•
	sources)							
8.8	Financial Assurance	Y	Y	Y	Y	Y	Y	
•	Determination							
8.9	Purpose(s) for Which	Ý	Y ·	Y	· Y	•• <b>Y</b>	Y ·	
	Licensed Material Will				3 •			
8.10	Be Used							
	Training and Experience	G.	G.	G	G	. G	G	
8.11	Radiation Safety Officer	Y.	Y	Y	Y	Y	Y	I, D
8.12	Authorized User(s) (AUs)	Y	·Y	Ŷ	Y	Y	Y	D
8.13	Authorized Nuclear Pharmacist (ANP)	Y	Y	N/A	N/A	N/A	Y	D
8.14	Authorized Medical	. N/A	N/A	Y*	N/A	Ý	Y	D
	Physicist (AMP)			÷ .				
8.15	Facilities and Equipment	G	• G	G	···G	G	G -	
8.16	Facility Diagram	• Y	Y	Y	Y.	• • Y	. ү.	
8.17	Radiation Monitoring Instruments	Y, P	Y, P	· Y, P	Y, P	Y, P		K
8.18	Dose Calibrator and Other Equipment	Р	Р	N/A	N/A	N/A	Р	
8.19	Therapy Unit -	N/A	· N/A	·N	N/A	Y	N	
	Calibration and Use							
8.20	Other Equipment and Facilities	N	N	N .	N	Y	N	
8.21	Radiation Protection Program	G	G	G	G	G	G	
8.22	Safety Procedures and Instructions	N/A	N/A	N/A	N/A	Y	N/A	
8.23	Occupational Dose	Р	Р	Р	Р	Р	Р	M

Section #	Topic	ble C.1 /	35.300	35.400	35.500	35.600	35.1000	APF
8.24	Area Surveys	P	P	P	P	P	<u>ээ.1000</u> р	R
8.25	Safe Use of Unsealed Licensed Material	P	P	N/A	N/A	N/A	P	T
8.26	Spill/Contamination Procedures	Р	Р	Р	N/A	N/A	Р	N
8.27	Service of Therapy Devices Containing Sealed Sources	N/A	N/A	N/A	N/A	Y	Y	
8.28	Minimization of Contamination	N	. N	N	N	N	N	
8.29	Waste Management	Р	P	P	Р	P	P	W
8.30	Fees	Y	Y	Y	Y	Y	Y	
8.31	Certification	Y	Y	Y.	Y	Y	Y	
8.32	Safety Instruction for Individuals in Restricted Areas	N	N	N	N	N	N	J
8.33	Public Dose	N	N	N	N	N	·N	1.
8.34	Opening Packages	Ν.	N .	N	N	N	N	
8.35	Written Directive Procedures	N/A	N	N .	Ņ/A	N	N	S
8.36	Release of Patients or Human Research Subjects	N	N	N	N/A	N/A	N	U
8.37	Mobile Medical Service	N	N	N	N	N ·	N	V
8.38	Audit Program	N	N	N	Ν.	N	N	L
8.39	Operating and Emergency Procedures	N	N	N	N	N	N	N
8.40	Material Receipt and Accountability	N	N	N	N	N <sup>·</sup>	N	
8.41	Ordering and Receiving	N ·	N·	N·	N	N	N	0
8.42	Sealed Source Inventory	N	N .	N	N	·N	N	
8.43	Records of Dosages and Use of Brachytherapy Source	N	N	N	N	N	N	
8.44	Recordkeeping	N	• N ; •	· N ·	N	N	N	X
8.45	Reporting	N	N	N	·· N	N	N	Y
8.46	Leak Tests	N	N	N	N	N	N	Q
8.47	Safety Procedures for Treatments when Patients are Hospitalized	N/A	N	N	N/A	N**	Ň	
8.48	Transportation	N	N	N	N	N	N	Z

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Table C.2 outlines the detailed responses that may be made to Items 5 and 6 on Form 313 for the type of radioactive material requested and the purposes for which it will be used. For example, if the applicant is seeking a license for unsealed byproduct material under 10 CFR 35.100 or 35.200, then the applicant should check the "yes" column next to 10 CFR 35.100 and 35.200 in Table C.2. The table then indicates appropriate responses for that type of use. An applicant may copy the checklist and include it in the license application.

The applicant should review the guidance in Section 5.2 and mark security-related information appropriately.

*Note:* The NRC now has regulatory authority for accelerator-produced radioactive material and discrete sources of Ra-226, as a result of the EPAct. Uses of these materials are added to Table C.2.

Tat		and 6 on NRC Form s checklist, check applica attach copy of checklist	ble rows and fill in detai				
☐ Yes ☐ No	Free of the state						
Yes	Radionuclide	Form or Manufacturer/ Model No.	Maximum Quantity	Purpose of Use			
YES	Any byproduct material permitted by 10 CFR 35.100	Any	As needed	Any uptake, dilution, and excretion study permitted by 10 CFR 35.100.			
YES	Any byproduct material permitted by 10 CFR 35.200	Any	As needed	Any imaging and localization study permitted by 10 CFR 35.200.			
NO	F-18	Any	curies	Production of PET radioactive drugs under 10 CFR 30.32(j).			
NO	O-15	Any	curies	Production of PET radioactive drugs under 10 CFR 30.32(j).			
NO	C-11	Any	curies	Production of PET radioactive drugs under 10 CFR 30.32(j).			
YES	Any byproduct material permitted by 10 CFR 35.300	Any	1000 millicuries	Any radiopharmaceutical therapy procedure permitted by 10 CFR 35.300.			
YES	Iodine-131	Any	millicuries	Administration of I-131 sodium iodide.			
' YES	Byproduct material permitted by 10 CFR 35.400 (Radionuclide	Sealed source or device (Manufacturer Theragenics Corp Model No) Theraseed Model 200	millicuries	Any brachytherapy procedure permitted by 10 CFR 35.400.			
	Byproduct material permitted by 10 CFR 35,400 (Radionuclide	Sealed source or device (Manufacturer Model No)	millicuries	Any brachytherapy procedure permitted by 10 CFR 35.400.			
	Byproduct material permitted by 10 CFR 35.400 (Radionuclide	Sealed source or device (Manufacturer Model No)	millicuries	Any brachytherapy procedure permitted by 10 CFR 35.400.			
	Byproduct material permitted by 10 CFR 35.400 (Radionuclide	Sealed source or device (Manufacturer Model No)	millicuries	Any brachytherapy procedure permitted by 10 CFR 35.400.			

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Та	Table C.2         Items 5 and 6 on NRC Form 313:         Radioactive Material and Use           (If using this checklist, check applicable rows and fill in details, and attach copy of checklist to the application.)					
Yes	Radionuclide	Form or Manufacturer/ Model No.	Maximum Quantity	Purpose of Use		
NO	Strontium-90	Sealed source or device (Manufacturer , Model No)	millicuries	Treatment of superficial eye conditions using an applicator distributed pursuant to 10 CFR 32.74 and permitted by 10 CFR 35.400.		
NO	Byproduct material permitted by 10 CFR 35.500 Check all that apply: Gd-153; I-125; Other, describe	Sealed source or device (Manufacturer Model No)	curies per source and curies total	Diagnostic medical use of sealed sources permitted by 10 CFR 35.500 in compatible devices registered pursuant to 10 CFR 30.32(g).		
NO	Iridium-192	Sealed source or device (Manufacturer Model No)	curies per source and curies total	One source for medical use permitted by 10 CFR 35.600, in a Manufacturer Model No. remote afterloading brachytherapy device. One source in its shipping container as necessary for replacement of the source in the remote afterloader device.		
NO	Cobalt-60	Sealed source or device (Manufacturer Model No)	curies per source and curies total	One source for medical use permitted by 10 CFR 35.600, in a Manufacturer Model No. teletherapy unit. One source in its shipping container as necessary fo replacement of the source in the teletherapy unit.		
NO	Cobalt-60	Sealed source or device (Manufacturer , Model No)	curies per source and curies total	For medical use permitted by 10 CFR 35.600, in a Manufacturer Model No. stereotactic radiosurgery device. Sources in the shipping container as necessary for replacement of the sources in the stereotactic		

Та	Table C.2         Items 5 and 6 on NRC Form 313:         Radioactive Material and Use           (If using this checklist, check applicable rows and fill in details, and attach copy of checklist to the application.)					
Yes	Radionuclide	Form or Manufacturer/ Model No.	Maximum Quantity	Purpose of Use		
				radiosurgery device.		
NO	Any byproduct material under 10 CFR 31.11	Prepackaged kits	millicuries	In vitro studies.		
NO	Depleted uranium	Metal	kilograms	Shielding in a teletherap unit.		
NO	Depleted uranium	Metal	kilograms	Shielding in a linear accelerator.		
NO	Any radionuclide in excess of 30 millicuries for use in calibration, transmission, and reference sources. (List radionuclide:	Sealed source or device (Manufacturer Model No)	millicuries	For use in a Manufacturer Model No, for calibration and checking of licensee's survey instruments.		
NO	Americium-241	Sealed source or device (Manufacturer Model No)	millicuries per source and millicuries total	Use as an anatomical marker.		
NO	Plutonium (principal radionuclide Pu-238)	Sealed sources	millicuries per source and grams total	As a component of Manufacturer Model No, nuclear-powered cardiac pacemakers for clinical evaluation in accordance with manufacturer's protocol dated This authorization includes: follow-up, explantation, recovery, disposal, and implantation.		
NO	Other	Form or Manufacturer/Model No.	millicuries	Purpose of use		

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Table C.3 contains a checklist that may be used to identify the attached documents that the applicant is supplying for items for which a response is required. For example, an applicant may fill in the name of the Radiation Safety Officer in Table C.3 and then check the boxes indicating which documents pertaining to the RSO are being included in the license application. An applicant may copy the checklist and include it in the license application.

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ltem Number and Title	Suggested Response	Check box to indicate material included in application
tem 7: Radiation Safety Officer	For an individual previously identified as an RSO on an NRC or Agreement State license or permit:	
<b>Name:</b> Christopher Moore NRC 24-16178-01	Previous license number (if issued by the NRC), or a copy of a license (if issued by an Agreement State), or a copy of a permit (if issued by an NRC master materials licensee) on which the individual was specifically named as the RSO.	х <mark>тэ</mark> х
	For an individual qualifying under 10 CFR 35.57(a)(3):	
	<ul> <li>Documentation that the individual was:</li> <li>the RSO for only the medical uses of accelerator-produced radioactive material or discrete sources of Ra-226 included in the definition of byproduct material as a result of the EPAct;</li> <li>the RSO for the medical uses of these materials before or during the effective period of NRC's waiver of August 31, 2005.</li> </ul>	
	For an individual qualifying under 10 CFR 35.50(a):	
	Copy of certification by a specialty board whose certification process has been recognized <sup>10</sup> by NRC or an Agreement State under 10 CFR 35.50(a).	
	AND	
	Description of the training and experience specified in 10 CFR 35.50(e) demonstrating that the proposed RSO is qualified by training in radiation safety, regulatory issues, and emergency procedures as applicable to the types of use for which the applicant seeks approval of an individual to serve as RSO.	
	AND	
	Written attestation, signed by a preceptor RSO, that the individual has satisfactorily completed training in and experience required for certification, as well as training in radiation safety, regulatory issues, and emergency procedures for the types of use for which the licensee seeks approval, and has achieved a level of radiation safety knowledge sufficient to function independently as an RSO.	
	AND	
	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	Ο

<sup>&</sup>lt;sup>10</sup>The names of board certifications that have been recognized by the NRC or an Agreement State are posted on the NRC's Web site <u>http://www.nrc.gov/materials/miau/med-use-toolkit.html</u>. C-9 NUREG - 1556, Vol. 9, Rev. 2

Item Number and Title	Suggested Response	Check box to indicate material included in application
	For an individual qualifying under 10 CFR 35.50(b):	
	Description of the training and experience specified in 10 CFR 35.50(b) demonstrating that the proposed RSO is qualified by training and experience as applicable to the types of use for which the applicant seeks approval of an individual to serve as RSO.	
, , , , , , , , , , , , , , , , , , , ,	AND	
	Description of the training and experience specified in 10 CFR 35.50(e) demonstrating that the proposed RSO is qualified by training in radiation safety, regulatory issues, and emergency procedures as applicable to the types of use for which the applicant seeks approval of an individual to serve as RSO.	٥
·	AND	
	Written attestation, signed by a preceptor RSO, that the individual has satisfactorily completed the required training and experience specified in 10 CFR 35.50(b), as well as the training in radiation safety, regulatory issues, and emergency procedures for the types of use for which the licensee seeks approval, and has achieved a level of radiation safety knowledge sufficient to function independently as an RSO.	٥
	AND	
	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	٥
	For an individual qualifying under 10 CFR 35.50(c)(1):	
	Copy of the certification(s) as a medical physicist by a board whose certification process has been recognized <sup>11</sup> by the NRC or an Agreement State under 10 CFR $35.51(a)$ and description of the experience specified in 10 CFR $35.50(c)(1)$ demonstrating that the proposed RSO is qualified by experience as applicable to the types of use for which the applicant seeks approval of an individual to serve as RSO.	٥
	AND	
	Description of the training and experience specified in 10 CFR 35.50(e) demonstrating that the proposed RSO is qualified by training in radiation safety, regulatory issues, and emergency procedures as applicable to the types of use for which the applicant seeks approval of an individual to serve as RSO.	
	AND	

<sup>&</sup>lt;sup>11</sup>The names of board certifications that have been recognized by the NRC or an Agreement State are posted on the NRC's Web site <u>http://www.nrc.gov/materials/miau/med-use-toolkit.html</u>.

Item Number and Title	Suggested Response	Check box to indicate material included in application
	Written attestation, signed by a preceptor RSO, that the individual has satisfactorily completed the required training and experience specified for certification, as well as training in radiation safety, regulatory issues, and emergency procedures for the types of use for which the licensee seeks approval, and has achieved a level of radiation safety knowledge sufficient to function independently as an RSO.	
	AND	
	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	D
	For an individual qualifying under 10 CFR 35.50(c)(2):	
	Copy of the licensee's license indicating that the individual is an AU, AMP, or ANP identified on the licensee's license and has experience with radiation safety aspects of similar types of use of byproduct material for which the applicant seeks approval of an individual to serve as RSO.	
	AND	
	Description of the training and experience specified in 10 CFR 35.50(e) demonstrating that the proposed RSO is qualified by training in radiation safety, regulatory issues, and emergency procedures as applicable to the types of use for which the applicant seeks approval of an individual to serve as RSO. AND	
	Written attestation, signed by a preceptor RSO, that the individual has satisfactorily completed the requirements in 10 CFR 35.50(c)(2), as well as training in radiation safety, regulatory issues, and emergency procedures for the types of use for which the licensee seeks approval, and has achieved a level of radiation safety knowledge sufficient to function independently as an RSO.	
	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	٥

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Item Number and Title	Suggested Response	Check box to indicate material included in application
Item 7: Authorized Users for medical uses:	For an individual previously identified as an AU on an NRC or Agreement State license or permit:	
Name(s), (including license number authorizing practice of medicine, podiatry, or dentistry if not provided previously or in attachment); Requested uses for each individual	Previous license number (if issued by the NRC), or a copy of the license (if issued by an Agreement State), or a copy of a permit issued by an NRC master materials licensee, or a copy of a permit issued by an NRC or Agreement State broad-scope licensee, or a copy of a permit issued by an NRC Master Materials License broad-scope permittee on which the physician, dentist, or podiatrist was specifically named as an AU for the uses requested. See Attachment 7b.	<b>ж</b> ат
	For an AU requesting authorization for an additional medical use:	
	Description of the additional training and experience to demonstrate the AU is also qualified for the new medical uses requested (e.g., training and experience needed to meet the requirements in 10 CFR 35.290 (b), 35.396, 35.390(b)(1)(ii)(G), or 35.690(c)). AND	o
	A preceptor attestation, if required (e.g., attestation is required to meet the requirements in 10 CFR 35.396, 35.390(b)(1)(ii)(G), or 35.690(c)).	
	For an individual qualifying under 10 CFR 35.57(b)(3):	
	Documentation that the physician, podiatrist, or dentist:	
	<ul> <li>used only accelerator-produced radioactive materials, or discrete sources of Ra-226, or both, for medical uses before or during the effective period of NRC's waiver of August 31, 2005; and</li> </ul>	
	• used these materials for the same medical uses requested.	
	For an individual qualifying under 10 CFR Part 35, Subparts D, E, F, G, and/or H, who is board-certified:	
	Copy of the certification(s) by a specialty board(s) whose certification process has been recognized <sup>12</sup> by the NRC under 10 CFR Part 35, Subpart D, E, F, G, or H, as applicable to the use requested.	
•	AND	

<sup>&</sup>lt;sup>12</sup>The names of board certifications that have been recognized by the NRC or an Agreement State are posted on the NRC's Web site <u>http://www.nrc.gov/materials/miau/med-use-toolkit.html</u>.

ltem Number and Title	Suggested Response	Check box to indicate material included in application
•	For an individual with a board certification recognized under 10 CFR 35.390, a description of the supervised work experience administering dosages of radioactive drugs required in 10 CFR 35.390(b)(1)(ii)(G) demonstrating that the proposed AU is qualified for the types of administrations for which authorization is sought;	
	AND	
	For an individual with a board certification recognized under 10 CFR 35.390 for medical uses described in 10 CFR 35.200, a description of the supervised work experience eluting generator systems required in 10 CFR 35.290(c)(1)(ii)(G) demonstrating the proposed AU is also qualified for imaging and localization medical uses;	
	AND	
	For an individual with a board certification recognized under 10 CFR 35.490 or 35.690 seeking authorization under 10 CFR 35.396(d), a description of the classroom and laboratory training and supervised work experience required to demonstrate qualifications for administering parenteral administrations of unsealed byproduct material requiring a written directive;	
	AND	
	For an individual seeking authorization under 10 CFR Part 35, Subpart H, description of the training specified in 10 CFR 35.690(c) demonstrating that the proposed AU is qualified for the type(s) of use for which authorization is sought; AND	. 🗆
	Written attestation, signed by a preceptor physician AU, that the training and experience specified for certification, as well as the clinical casework, or training and experience required by 10 CFR 35.396(d); or training for 10 CFR 35.600 types of use, if appropriate, have been satisfactorily completed and that a level of competency sufficient to function independently as an AU for the medical uses authorized has been achieved; AND	
	If applicable, description of recent related continuing education and	0

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(Check all applicable rows and fill in details and attach a copy of the checklist to the application or provide information separately.)				
Item Number and Title	Suggested Response	Check box to indicate material included in application		
	For an individual qualifying under 10 CFR Part 35, Subparts D, E, F, G, and/or H, who is not board-certified:			
	A description of the training and experience identified in 10 CFR Part 35, Subparts D, E, F, G, and H, demonstrating that the proposed AU is qualified by training and experience for the use(s) requested.			
	AND			
	For an individual seeking authorization under 10 CFR Part 35, Subpart H, description of the training specified in 10 CFR 35.690 (c) demonstrating that the proposed AU is qualified for the type(s) of use for which authorization is sought.			
	Written attestation, signed by a preceptor physician AU, that the above training and experience have been satisfactorily completed and that a level of competency sufficient to function independently as an AU for the medical uses authorized has been achieved.	a		
	AND			
	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	٦		
Item 7: Authorized Nuclear Pharmacists	For an individual previously identified as an ANP on an NRC or Agreement State license or permit:			
Name(s) and license to practice pharmacy:	Previous license number (if issued by the NRC), or a copy of the license (if issued by an Agreement State), or a copy of a permit issued by an NRC master materials licensee, or a copy of a permit issued by an NRC or Agreement State broad-scope licensee, or a copy of a permit issued by an NRC Master Materials License broad-scope permittee on which the individual was specifically named ANP.			
	For an individual qualifying under 10 CFR 35.57(a)(3):			
	Documentation that the nuclear pharmacist:			
	<ul> <li>used only accelerator-produced radioactive materials or discrete sources of Ra-226, or both, in the practice of nuclear pharmacy before or during the effective period of NRC's waiver of August 31, 2005; and</li> </ul>			
	• used these materials for the same uses requested.			

Table C.3       Items 7 through 11 on NRC Form 313: Training & Experience, Facilities         & Equipment, Radiation Protection Program, and Waste Disposal         (Check all applicable rows and fill in details and attach a copy of the checklist to the application or provide information separately.)		
Item Number and Title	Suggested Response	Check box to indicate material included in application
	For an individual qualifying under 10 CFR 35.55(a):	
	Copy of the certification(s) of the specialty board whose certification process has been recognized <sup>13</sup> under 10 CFR 35.55(a). AND	
	Written attestation, signed by a preceptor ANP, that training and experience required for certification have been satisfactorily completed and that a level of competency sufficient to function independently as an ANP has been achieved. AND	
	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	Ū
	For an individual qualifying under 10 CFR 35.55(b):	
	Description of the training and experience specified in 10 CFR 35.55(b) demonstrating that the proposed ANP is qualified by training and experience. AND	٦
	Written attestation, signed by a preceptor ANP, that the above training and experience have been satisfactorily completed and that a level of competency sufficient to function independently as an ANP has been achieved. AND	
	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	
tem 7: Authorized Medical Physicists	For an individual previously identified as an AMP on an NRC or Agreement State license or permit:	
Name(s):	Previous license number (if issued by the NRC), or a copy of the license (if issued by an Agreement State), or a copy of a permit issued by an NRC master materials licensee, or a copy of a permit issued by an NRC or Agreement State broad-scope licensee, or a copy of a permit issued by an NRC Master Materials License broad-scope permittee on which the individual was specifically named an AMP for the uses requested.	

<sup>13</sup>The names of board certifications that have been recognized by the NRC or an Agreement State are posted on the NRC's Web site <u>http://www.nrc.gov/materials/miau/med-use-toolkit.html</u>. C-15 NUREG - 1556, Vol. 9, I

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Item Number and Title	:	Suggested Response	Check box to indicate material included in application
· · ·		For an individual qualifying under 10 CFR 35.57(a)(3):	
	•.	Documentation that the medical physicist:	Ø
	: : :	<ul> <li>used only accelerator-produced radioactive material, discrete sources of Ra-226, or both, for medical uses before or during the effective period of NRC's waiver of August 31, 2005; and</li> </ul>	
		• used these materials for the same medical uses requested.	
		For an individual qualifying under 10 CFR 35.51(a):	
	• .	Copy of the certification(s) of the specialty board(s) whose certification process has been recognized <sup>14</sup> under 10 CFR 35.51(a).	σ
**********************		AND	
	•	Description of the training and experience specified in 10 CFR 35.51(c) demonstrating that the proposed AMP is qualified by training in the types of use for which he or she is requesting AMP status, including hands-on device operation, safety procedures, clinical use, and operation of a treatment planning system.	
•••••••••••••••••••••••		AND	
.*		Written attestation, signed by a preceptor AMP, that the required training and experience required for certification, as well as the training and experience specified in 10 CFR 35.51(c) have been satisfactorily completed, and that a level of competency sufficient to function independently as an AMP has been achieved.	
		AND	
	1	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	, O
•.		For an individual qualifying under 10 CFR 35.51(b):	
, 		Description of the training and experience demonstrating that the proposed AMP is qualified by training and experience identified in 10 CFR 35.51(b)(1) for the uses requested.	
		AND	

<sup>14</sup>The names of board certifications that have been recognized by the NRC or an Agreement State are posted on the NRC's Web site <u>http://www.nrc.gov/materials/miau/med-use-toolkit.html.</u>

	cable rows and fill in details and attach a copy of the checklist to the a provide information separately.)	application or
Item Number and Title	Suggested Response	Check box to indicate material included in application
	Description of the training and experience specified in 10 CFR 35.51(c) demonstrating that the proposed AMP is qualified by training in the types of use for which he or she is requesting AMP status, including hands-on device operation, safety procedures, clinical use, and operation of a treatment planning system.	٥
	AND	
	Written attestation, signed by a preceptor AMP, that the required training and experience have been satisfactorily completed and that a level of competency sufficient to function independently as an AMP has been achieved.	٦
	AND	
· .	If applicable, description of recent related continuing education and experience as required by 10 CFR 35.59.	
Item 7: Authorized User for nonmedical uses	Note: For purposes of this section of the table, the term "authorized user" is used to mean individuals authorized for the nonmedical uses described. See Sections 8.11 and 8.12.	
	For an individual previously authorized for nonmedical use on an NRC or Agreement State license or permit:	
Name(s): Requested types, quantities, and nonmedical uses for each individual	Previous license number (if issued by the NRC), or a copy of the license (if issued by an Agreement State), or a copy of a permit issued by an NRC master materials licensee, or a copy of a permit issued by an NRC or Agreement State broad-scope licensee, or a copy of a permit issued by an NRC Master Materials License broad-scope permittee on which the individual was specifically named an AU for the types, quantities, and uses requested.	
······································	For individuals qualifying under 10 CFR 30.33(a)(3):	
	Documentation of the individual's training and experience demonstrating that the individual is qualified to use the types and quantities of licensed materials for the requested uses.	. 🗖
ltem 9: Facility Diagram	A diagram is enclosed that describes the facilities and identifies activities conducted in all contiguous areas surrounding the area(s) of use. The following information is included:	XXX.
	<ul> <li>Guidance in Section 5.2 was reviewed and security-related sensitive information provided is marked accordingly.</li> </ul>	٥
	• Drawings should be to scale, indicating the scale used.	хних

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(Check all applic	able rows and fill in details and attach a copy of the checklist to the a provide information separately.)	pplication or
Item Number and Title	Suggested Response	Check box to indicate material included in application
	<ul> <li>Location, room numbers, and principal use of each room or area where byproduct material is prepared, used or stored, location of direct transfer delivery tubes from a PET radionuclide/radioactive drug production facility or production area of PET radioactive drugs under 10 CFR 30.32(j), and areas where higher energy gamma- emitting radionuclides (e.g., PET radionuclides) are used;</li> </ul>	<b>A</b> XX
	<ul> <li>Location, room numbers, and principal use of each adjacent room (e.g., office, file, toilet, closet, hallway), including areas above, beside, and below therapy treatment rooms, indicating whether the room is a restricted or unrestricted area as defined in 10 CFR 20.1003; and</li> </ul>	
	• Provide shielding calculations and include information about the type, thickness, and density of any necessary shielding to enable independent verification of shielding calculations, including a description of any portable shields used (e.g., shielding of proposed patient rooms used for implant therapy, including the dimensions of any portable shield, if one is used; source storage safe).	
	In addition to the above, for teletherapy and GSR facilities, applicants should provide the directions of primary beam usage for teletherapy units and, in the case of an isocentric unit, the plane of beam rotation.	<b>.</b>
Item 9: Radiation Monitoring Instruments	A statement that: "Radiation monitoring instruments will be calibrated by a person qualified to perform survey meter calibrations."	XXX
instruments	AND/OR	
· · ·	A statement that: "We have developed and will implement and maintain written survey meter calibration procedures in accordance with the requirements in 10 CFR 20.1501 and that meet the requirements of 10 CFR 35.61." AND	
	A description of the instrumentation (e.g., gamma counter, solid state detector, portable or stationary count rate meter, portable or stationary dose rate or exposure rate meter, single or multichannel analyzer, liquid scintillation counter, proportional counter) that will be used to perform required surveys. AND	XXXX
	A statement that: "We reserve the right to upgrade our survey instruments as necessary as long as they are adequate to measure the type and level of radiation for which they are used."	х <mark>д</mark> х
Item 9: Dose Calibrator and Other Dosage Measuring Equipment	A statement that: "Equipment used to measure dosages will be calibrated in accordance with nationally recognized standards or the manufacturer's instructions."	X3X

Table C.3	Items 7 through 11 on NRC Form 313: Training & Experience, Facilities	1		
& Equipment, Radiation Protection Program, and Waste Disposal				

(Check all applicable rows and fill in details and attach a copy of the checklist to the application or provide information separately.)

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provide information separately.)		
Item Number and Title	Suggested Response	
	When administering dosages of alpha-emitting unsealed byproduct material in other than unit dosages made by a manufacturer or preparer licensed under 10 CFR 32.72 or 10 CFR 30.32(j),	
	• A statement that: "Dosages will be determined by relying on the provider's dose label for measurement of the radioactivity and a combination of volumetric measurement and mathematical calculation."	
	OR	
	• We are providing a description of the dosage measurement equipment, the nationally recognized calibration standard (or manufacturer's calibration instructions), and dosage measurement procedures.	٥
Item 9: Therapy Unit - Calibration and Use	We are providing the procedures required by 10 CFR 35.642, 10 CFR 35.643, and 10 CFR 35.645, if applicable to the license application.	٥
Item 9: Other Equipment and Facilities	Guidance in Section 5.2 was reviewed and security-related information provided is marked accordingly.	
	Attached is a description, identified as Attachment 9.4, of additional facilities and equipment.	٦
	For manual brachytherapy facilities, we are providing a description of the emergency response equipment.	
	For PET radionuclide use, PET radioactive drug production, and radiopharmaceutical therapy programs, we are providing a description of the additional facilities and equipment for these uses.	
	For teletherapy, GSR, and remote afterloader facilities, we are providing a description of the following:	
	• Warning systems and restricted area controls (e.g., locks, signs, warning lights and alarms, interlock systems) for each therapy treatment room;	D
	Area radiation monitoring equipment;	
	• Viewing and intercom systems (except for LDR units);	۵
	• Steps that will be taken to ensure that no two units can be operated simultaneously, if other radiation-producing equipment (e.g., linear accelerator, X-ray machine) is in the treatment room;	
· .	<ul> <li>Methods to ensure that whenever the device is not in use or is unattended, the console keys will be inaccessible to unauthorized persons; and</li> </ul>	
	Emergency response equipment.	۵

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Table C.3       Items 7 through 11 on NRC Form 313: Training & Experience, Facilities         & Equipment, Radiation Protection Program, and Waste Disposal         (Check all applicable rows and fill in details and attach a copy of the checklist to the application or provide information separately.)		
Item Number and Title	Suggested Response	Check box to indicate material included in application
Item 10: Safety Procedures and Instructions	Attached are procedures required by 10 CFR 35.610.	
	Guidance in Section 5.2 was reviewed and security-related sensitive information provided is marked accordingly.	· 🗖
Item 10: Occupational Dose	A statement that: "Either we will perform a prospective evaluation demonstrating that unmonitored individuals are not likely to receive, in 1 year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20 or we will provide dosimetry that meets the requirements listed under 'Criteria' in NUREG-1556, Vol. 9, Rev. 1, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licenses.'"	Xeen X
	OR	3
	A description of an alternative method for demonstrating compliance with the referenced regulations.	
Item 10: Area Surveys	A statement that: "We have developed and will implement and maintain written procedures for area surveys in accordance with 10 CFR 20.1101 that meet the requirements of 10 CFR 20.1501 and 10 CFR 35.70."	х <mark>ы</mark> х
ltem 10: Safe Use of Unsealed Licensed Material	A statement that: "We have developed and will implement and maintain procedures for safe use of unsealed byproduct material that meet the requirements of 10 CFR 20.1101 and 10 CFR 20.1301."	х <mark>ф</mark> к
ltem 10: Spill/Contamination Procedures	A statement that: "We have developed and will implement and maintain written procedures for safe response to spills of licensed material in accordance with 10 CFR 20.1101."	XXXX
Item 10: Installation, Maintenance, Adjustment, Repair,	Name of the proposed employee and types of activities requested:	
and Inspection of Therapy Devices Containing Sealed Sources	Description of the training and experience demonstrating that the proposed employee is qualified by training and experience for the use requested. AND	٦
	Copy of the manufacturer's training certification and an outline of the training in procedures to be followed.	٦
em 10: finimization of ontamination A response is not required under the following condition: the NRC will consider that the above criteria have been met if the information provided in applicant's responses satisfy the criteria in Sections 8.15, 8.16, 8.21, 8.25, 8.27, and 8.29, on the topics: facilities and equipment, facility diagram, Radiation Protection Program, safety program, and waste management.		N/A

Table C.3       Items 7 through 11 on NRC Form 313: Training & Experience, Facilities         & Equipment, Radiation Protection Program, and Waste Disposal         (Check all applicable rows and fill in details and attach a copy of the checklist to the application or provide information separately.).		
Item Number and Title	Suggested Response	Check box to indicate material included in application
Item 11: Waste Management	A statement that: "We have developed and will implement and maintain written waste disposal procedures for licensed material in accordance with 10 CFR 20.1101, that also meet the requirements of the applicable section of 10 CFR Part 20, Subpart K, and of 10 CFR 35.92."	XXXX
	Attached is a description of the radioactive waste incinerator facility and related portions of the Radiation Safety Program (10 CFR 20.2004).	D
	Attached is a request to receive potentially contaminated radiation transport shields from consortium members receiving PET radioactive drugs noncommercially transferred under 10 CFR 30.32(j) authorization.	. 0

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Attachment 7a

# **Radiation Safety Officer**

Christopher Moore - Currently listed as RSO on NRC License # 24-16178-01

Attachment 7b

# Authorized Users

Authorized User	Previous License	Material and Use
Robert C. Newth, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200, 35.300
Robert A. MacNaughton, II, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200, 35.300
Larry Nussbaum, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200, 35.300
Venkat Pasnoori, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200, 35.300
Richard A Morrison, M.D.	NRC 24-16178-01	10 CFR 35.400
Gordon D. Stille, M.D.	NRC 24-16178-01	10 CFR 35.400
Scott C. Cozad, M.D.	NRC 24-16178-01	10 CFR 35.400
John I. Holloran, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200, 35.300
Christine Keesling, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200, 35.300
Timothy G. Raveill, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200
Randall C. Newth, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200
Michael P. Green, D.O.	NRC 24-16178-01	10 CFR 35.100, 35.200
Rajendran Sabapathy, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200
John Brian Pope, M.D.	NRC 24-16178-01	10 CFR 35.100, 35.200, 35.300
		limited to oral administration of
		I-131 in quantities less than or
		equal to 33 millicuries

Chaislophen Moore Noclean Medicine Dept. Liberty Hospital Liberty, MO. 64068





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