



PARKVIEW HEALTH

TRUSTED CARE

November 8, 2010

U. S. Nuclear Regulatory Commission
Materials Licensing Section
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Dear Sir or Madam:

Parkview Health would like to amend its Byproduct Materials License, Number 13-01284-02, to list Joseph Ott, M.S. as the Radiation Safety Officer. Mr. Ott is currently listed as an Authorized Medical Physicist on the Parkview Health License and NRC Form 313(RSO) is enclosed. Please note that we were not able to obtain the signature of a precepting RSO for Mr. Ott. As a consequence, we are requesting a specific exemption to approve Mr. Ott without the signature of a precepting RSO. The request of this type of exemption is described in NUREG/BR-0117, No. 07-03, Fall 2007, page 4.

In addition, we request that Subhash C. Sharma, Ph.D. be removed from our license as both the Radiation Safety Officer and an Authorized Medical Physicist.

If there are any questions concerning this license amendment, please contact feel free to contact our nuclear medicine physicist Mr. Patrick Byrne, at 877-317-5811.

Sincerely,

Daniel Garman
Senior Vice President

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PARKVIEW HEALTH

TRUSTED CARE

RSO / EXECUTIVE MANAGEMENT
LETTER OF UNDERSTANDING

November 8, 2010

Joseph Ott, M.S.
Radiation Safety Officer
Parkview Health
10501 Corporate Drive
Fort Wayne, IN 46845

Re: Radiation Safety Officer / Executive Management
Letter of Understanding

Dear Joe:

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.

Furthermore, in compliance with 10 CFR 35.24(e),(g), 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,


Executive Management


Radiation Safety Officer

**RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE
AND PRECEPTOR ATTESTATION
[10 CFR 35.50]**APPROVED BY OMB: NO. 3150-0120
EXPIRES: 3/31/2012

Name of Proposed Radiation Safety Officer

Joseph Thomas Ott, M.S.

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**

- a. Provide a copy of the board certification.
- b. Use Table 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.

OR☐ **2. Current Radiation Safety Officer Seeking Authorization to Be Recognized as a Radiation Safety Officer for the Additional Medical Uses Checked Above**

- a. 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.
- b. 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			
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Radiation biology			
Radiation dosimetry			
Total Hours of Training:			

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		
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides		
Securing and controlling byproduct material		
Using administrative controls to avoid mistakes in administration of byproduct material		
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures		
Using emergency procedures to control byproduct material		
Disposing of byproduct material		
Licensed Material Used (e.g., 35.100, 35.200, etc.)+ _____ _____ _____		

+ Choose all applicable sections of 10 CFR Part 35 to describe radioisotopes 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	License/Permit Number listing supervising individual as a Radiation Safety Officer
<p>This license authorizes the following medical uses:</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input type="checkbox"/> 35.100</div> <div style="width: 50%;"><input type="checkbox"/> 35.200</div> <div style="width: 50%;"><input type="checkbox"/> 35.300</div> <div style="width: 50%;"><input type="checkbox"/> 35.400</div> <div style="width: 50%;"><input type="checkbox"/> 35.500</div> <div style="width: 50%;"><input type="checkbox"/> 35.600 (remote afterloader)</div> <div style="width: 50%;"><input type="checkbox"/> 35.600 (teletherapy)</div> <div style="width: 50%;"><input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)</div> <div style="width: 50%;"><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	University of Cincinnati Medical Physics graduate program	9/2005 - 3/2006
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	University of Cincinnati Medical Physics graduate program	9/2005 - 3/2006
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	University of Cincinnati Medical Physics graduate program; initial training by Parkview Cancer Center Physics Staff	9/2005 - 3/2006; 4/2006
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses	N/A	
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses	University of Cincinnati Medical Physics graduate program	9/2005 - 3/2006
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses	N/A	
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):	N/A	

3. Structured Educational Program for Proposed Radiation Safety Officer (continued)

- 13-01284-02

OR

- ## PART II – PRECEPTOR ATTESTATION

OR

- 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 Licensees 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 _____ 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 _____ 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 _____
Name of Facility

License/Permit Number: _____

Name of Preceptor

Signature

Telephone Number

Date

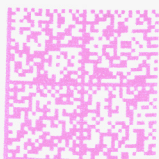


PARKVIEW

COMPREHENSIVE CANCER

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RETURN RECEIPT REQUESTED

CERTIFIED MAIL



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Lisle, IL 60532-4352