State of Utah
GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF RADIATION CONTROL
Dane L. Finerfrock
Director

December 21, 2009

Adam Arndt
Radiation Safety Officer
Park City Medical Center
900 Round Valley Drive
Park City, Utah 84060

RE: Radioactive Material License Number UT 2200524,
License Action Number 252-2009

Dear Mr. Arndt:

Please find enclosed your Utah Radioactive Material License Amendment No. 01.

If you have any questions or require clarification concerning the amendment, you may contact us at (801) 536-4250.

Sincerely,

Mario A. Bettolo, M.S.
Health Physicist
Division of Radiation Control

Enclosure

DRC-03
October 1989

UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF RADIATION CONTROL
RADIOACTIVE MATERIAL LICENSE

Pursuant to Utah Code Ann. Title 19, Chapter 3 and the Radiation Control Rules, Utah Administrative Code R313, and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing such licensee to transfer, receive, possess and use the radioactive material designated below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This licensee is subject to all applicable rules and orders now or hereafter in effect and to any conditions specified below.

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LICENSEE

1. Name: Park City Medical Center

2. Address: 900 Round Valley Dr.
Park City, UT 84060

3. License Number UT 2200524

4. Expiration Date
May 30, 2014

5. License Category - 7-b

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6. Radioactive material (element and mass number)	7. Chemical and/or physical form	8. Maximum quantity licensee may possess at any one time
A. Any radioactive material identified in R313-32 [incorporating 10 CFR 35.100 by reference]	A. Any radiopharmaceutical identified in R313-32 [incorporating 10 CFR 35.100 by reference]	A. As needed
B. Any radioactive material identified in R313-32 [incorporating 10 CFR 35.200 by reference]	B. Any radiopharmaceutical identified in R313-32 [incorporating 10 CFR 35.200 by reference]	B. As needed

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9. AUTHORIZED USE

A. Medical use described in R313-32 [incorporating 10 CFR 35.100 by reference].

B. Medical use described in R313-32 [incorporating 10 CFR 35.200 by reference].

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CONDITIONS

10. Location of Use: 900 Round Valley Dr., Park City, Utah

11. Consultant Radiation Safety Officer: Adam Arndt M. S.

Facility Contact: Jeff Kirk, Imaging Coordinator.

190 ARROWHEAD DRIVE
EVANSTON, WY 82930
Phone: 307-783-8275
Fax: 307-783-8274

EVANSTON REGIONAL HOSPITAL

Fax

To:	MICHELLE SIMMONS	**From:**	RADIOLOGY
Fax:	817-860-8188	**Date:**	21 JAN 11
Phone:		**Pages:**	4
Re:	NRC AMENDMENT	**CC:**	1

☐ **Urgent** ☒ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

•Comments:

Copy To ADAM ARNOT

99-272-9152

January 21, 2011

Nuclear Regulatory Commission
Region IV, Office of Materials Licensing
611 Ryan Plaza Dr, Suite 400
Arlington, TX 76011-4005

RE: Evanston Regional Hospital
Docket No.: 03033981
License No.: 49-27532-01
Mail Control No.: 573918

Dear Michelle Simmons:

Enclosed is our response to your inquiry referencing docket No: 03033981.

1a. For the description of the control over the radiation safety programs, please see the attached RSO authority, duties and responsibilities document listed above. Mr. Arndt, the Consultant RSO, will be able to exercise his authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.

1b. For the description of the relationship that will exist between the Consultant RSO and our institutions' management regarding expenditure of funds to facilitate the objectives of our RAM licensees' radiation safety programs and related regulatory requirements, please see the attached RSO authority, duties and responsibilities document listed above. As stated in the document, the Consultant RSO, Mr. Arndt, shall have the resources (which includes funds) to execute his authority, duties, and responsibilities over the radiation safety programs.

1c. Mr. Arndt is currently the RSO at three other facilities. Mr. Arndt shall, at least, visit the Nuclear Medicine Department at Evanston Regional Hospital on a quarterly basis to review the Radiation Protection Program and to ensure compliance with NRC regulations. Mr. Arndt also visits Evanston Regional Hospital at various times of the year to evaluate the radiation producing machine safety program. The Consultant RSO will be available and on-site when necessary.

1d. Jon Sigurdson the radiology manager will serve as the point of contact during the RSO's absence.

1e. The Consultant RSO's overall availability to respond to questions or operational issues that arise during the conduct of Evanston Regional Hospital's radiation safety program and related regulatory requirements will

be 24 hours per day, 7 days per week. Medical Physics Consultants, Inc., Mr. Arndt's employer, has an 800 number through which he can be contacted at any time. Part of the consultant RSO agreement with MPC includes unlimited phone consultation to address any operational issues or questions. The maximum amount of time that it could take the Consultant RSO to arrive at the facility in case of an emergency requiring his presence is 24 hours. Since Mr. Arndt lives in Salt Lake City, UT which is close proximity to our facility and works mainly in Utah, it would typically take him much less than 24 hours to respond. By the end of most work days, Mr. Arndt returns to his home in Salt Lake and would be able to provide immediate emergency response. The only exceptions to this immediate response would be when his consulting duties or a vacation trip takes him out of town.

2a. A copy of Intermountain Park City Hospital's License Agreement State license UT 2200524 was sent on January 18, 2011 with confirmation of receipt demonstrating Mr. Arndt has previous training and experience as a RSO for the modalities for which Evanston Regional Hospital is authorized.

Please contact our consulting physicist/RSO, Adam Arndt, at 800-321-2207 or Anthony Montoya at (307) 789-3636, if you require additional information or have questions concerning this response. Thank you for your cooperation and attention in this matter.

Sincerely,

George Winn
Chief Executive Officer

RADIATION SAFETY OFFICER
AUTHORITY, DUTIES AND RESPONSIBILITIES

The Radiation Safety Officer (RSO) shall:

1. Have the authority to implement the Radiation Protection Program as referenced in 10 CFR 20.1101.

2. Have the authority, organizational freedom, time, resources, and management prerogative to:

   a. Identify radiation safety problems;
   b. Initiate, recommend or provide corrective actions,
   c. Stop unsafe operations; and,
   d. Verify implementation of corrective actions.

3. Investigate deviations from the radiation safety practices approved by facility management and/or the Radiation Safety Committee, if applicable.

4. Collect in a centralized location, executive management approved procedures that can include policy and technical issues which, would makeup the Radiation Protection Program as follows:

   a. Authorization for the purchase of radioactive material.
   b. Receipt and opening of packages containing radioactive material.
   c. Storage of radioactive material.
   d. Inventory control of radioactive material.
   e. Safe use of radioactive material.
   f. Emergency procedures in the event of loss, theft, etc.
   g. Periodic radiation surveys and wipe tests
   h. Checks of radiation survey and other radiation safety instruments.
   i. Disposal of radioactive material.
   j. Personnel training of those who work in or frequent areas of radioactive material use or storage.

5. Oversee a record system of the Radiation Protection Program per 10 CFR 20.2102 to include at least the following:

   The provisions of the Radiation Protection Program until the license is terminated by the NRC such as:

   a. All records, reports, written policies and procedures required by regulatory agencies concerning radioactive material.

   b. A copy of the regulations governing the possession, use and disposal of licensed material, such as Title 10 Code of Federal Regulations.

Audits and other reviews of the Radiation Protection Program content and implementation for a period of three (3) years after the record is made.

RADIATION SAFETY OFFICER

6. Periodically evaluate "action levels" for continued appropriateness to ensure compliance with 10 CFR 20.1501 and 1502 for the following:

   a. Personnel exposure investigation levels
   b. Area surveys dose rate and contamination levels
   c. Bioassays, if necessary
   d. Radioactive effluent concentrations, if necessary

7. Review the following Radiation Protection Program records, if applicable:

   a. Sealed source inventories
   b. Sealed source leak tests
   c. Dose calibrator linearity tests
   d. Dose calibrator accuracy tests
   e. Dose calibrator geometrical variation tests
   f. Occupational radiation exposure reports
   g. Medical event documentation
   h. Spill / incident reports for cause and corrective action
   i. Dose rate and contamination survey results
   j. Changes in the radiation safety program

8. Ensure the use of reasonable practices and controls to strive to maintain doses to workers and to the public are ALARA, in compliance with 10 CFR 20.1101(b).

9. Review with facility management at least annually of the content of the Radiation Protection Program and determine if the written program is being implemented in compliance with 10 CFR 20.1101(c).

10. Ensure as a part of the ALARA effort that individual members of the public shall not receive a Total Effective Dose Equivalent (TEDE) of more than 10 mrem (0.1 mSv) per year from airborne radioactive material releases as per 10 CFR 20.1101(d) as necessary.

11. Be a member of the Radiation Safety Committee (RSC), if applicable, that will oversee all uses of byproduct material permitted by the license as per 10 CFR 35.24(f).