



SCHNEIDER REGIONAL
MEDICAL CENTER

ROY LESTER SCHNEIDER
HOSPITAL

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COMMUNITY HEALTH CENTER

CHARLOTTE KIMELMAN
CANCER INSTITUTE

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Sandy Gabriel, PhD
Senior Health Physicist
Medical Branch
Division of Nuclear Materials Safety, Region 1
475 Allendale Rd
King of Prussia, PA. 19406-1415

03013764

Reference: Mail Control 574399 - NRC License Number 55-17986-01 amendment application

Dear Dr. Gabriel

Thank you for your email sent to our medical physicist, Damian D.G. Rudder, M.Sc. (mail control 574399) in response to our application for an amendment to our radioactive materials license.

With regard to the items raised in your correspondence, please note the following:

1. In order to ensure we have adequate backup for our HDR service when Mr. Rudder is on leave, we wish, for the mean time, to have Ray A Els, Ph.D. and Mark E. Colgan, M.S. remain listed as AMP's on our license.
2. In order to proceed with the replacement of **Kab Kyub Kim, M.D.** with **Damian Rudder, M.Sc.** as **Radiation Safety Officer (RSO)**, attached is a new NRC form 313A (RSO) preceptor attestation (10 CFR 35.50) attesting to Mr. Rudder's training in radiation safety for parts 35.1.00, 35.200, 35.300, 35.400 and 35.600. Documentation of additional training received for the above is attached.

Sincerely,

Alice Taylor
Chief Executive Officer

574399

NMSS/RGN1 MATERIALS-002

**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

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
This license authorizes the following medical uses:	
<input type="checkbox"/> 35.100	<input type="checkbox"/> 35.200
<input type="checkbox"/> 35.300	<input type="checkbox"/> 35.400
<input type="checkbox"/> 35.500	<input type="checkbox"/> 35.600 (remote afterloader)
<input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.600 (teletherapy)
	<input type="checkbox"/> 35.1000 ()

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	RSNA/ AAPM Mark Colgan, M.S. Amirul Hoque, Ph.D.	2/16/2011 1/31/2011 2005
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	RSNA/ AAPM Mark Colgan, M.S. Amirul Hoque, Ph.D.	2/16/2011 1/31/2011 2005
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	RSNA/ AAPM Mark Colgan, M.S.	2/16/2011 1/31/2011
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses		
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses	Mark Colgan, M.S. Amirul Hoque, Ph.D.	1/31/2011 2005
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses		
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):		

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

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

c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)

Supervising Individual *If training was provided by supervising RSO, AU, AMP, or ANP. (If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.)*

License/Permit Number listing supervising individual

Mark Colgan, M.S.

NRC License #55-17986-01 (Amendment 18)

License/Permit lists supervising individual as:

- Radiation Safety Officer Authorized User Authorized Nuclear Pharmacist
- Authorized Medical Physicist

Authorized as RSO, AU, ANP, or AMP for the following medical uses:

- 35.100 35.200 35.300 35.400
- 35.500 35.600 (remote afterloader) 35.600 (teletherapy)
- 35.600 (gamma stereotactic radiosurgery) 35.1000 (_____)

d. Skip to and complete Part II Preceptor Attestation.

OR

4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist identified on the licensee's license

- a. Provide license number.
- b. Use the table in section 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.

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 Damian D.G. Rudder, M.Sc. has satisfactorily completed the requirements in
Name of Proposed Radiation Safety Officer
10 CFR 35.50(a)(1)(i) and (a)(1)(ii); or 35.50 (a)(2)(i) and (a)(2)(ii); or 35.50(c)(1).

OR

2. Structured Educational Program for Proposed Radiation Safety Officers

I attest that _____ has satisfactorily completed a structural educational
Name of Proposed Radiation Safety Officer
program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).

OR

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

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

c. Training in radiation safety, regulatory issues, and emergency procedures for all types of medical use on the license (continued)

<p>Supervising Individual <i>If training was provided by supervising RSO, AU, AMP, or ANP. (If more than one supervising individual is necessary to document supervised training, provide multiple copies of this page.)</i></p> <p>Amuril Hoque, Ph.D.</p>	<p>License/Permit Number listing supervising individual</p> <p>PA DEP RML # PA-0042 (from NRC #37-10599-01)</p>
<p>License/Permit lists supervising individual as:</p> <p> <input type="checkbox"/> Radiation Safety Officer <input type="checkbox"/> Authorized User <input type="checkbox"/> Authorized Nuclear Pharmacist <input checked="" type="checkbox"/> Authorized Medical Physicist </p> <p>Authorized as RSO, AU, ANP, or AMP for the following medical uses:</p> <p> <input checked="" type="checkbox"/> 35.100 <input checked="" type="checkbox"/> 35.200 <input checked="" type="checkbox"/> 35.300 <input type="checkbox"/> 35.400 <input type="checkbox"/> 35.500 <input checked="" type="checkbox"/> 35.600 (remote afterloader) <input type="checkbox"/> 35.600 (teletherapy) <input type="checkbox"/> 35.600 (gamma stereotactic radiosurgery) <input type="checkbox"/> 35.1000 (_____) </p>	

d. Skip to and complete Part II Preceptor Attestation.

OR

4. Authorized User, Authorized Medical Physicist, or Authorized Nuclear Pharmacist identified on the licensee's license

- a. Provide license number.
- b. Use the table in section 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.

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 Damian D.G. Rudder, M.Sc. has satisfactorily completed the requirements in

Name of Proposed Radiation Safety Officer

10 CFR 35.50(a)(1)(i) and (a)(1)(ii); or 35.50 (a)(2)(i) and (a)(2)(ii); or 35.50(c)(1).

OR

2. Structured Educational Program for Proposed Radiation Safety Officers

I attest that _____ has satisfactorily completed a structural educational

Name of Proposed Radiation Safety Officer

program consisting of both 200 hours of classroom and laboratory training and one year of full-time radiation safety experience as required by 10 CFR 35.50(b)(1).

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 **Damian D.G. Rudder, M.Sc.** 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

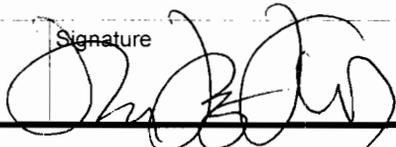
I attest that Damian D.G. Rudder, M.Sc. has achieved a level of radiation safety knowledge
Name of Proposed Radiation Safety Officer
sufficient to function independently as a Radiation Safety Officer for a medical use licensee.

Fourth Section
Complete the following for Preceptor Attestation and signature

I am the Radiation Safety Officer for SCHNEIDER REGIONAL MEDICAL CENTER
Name of Facility

License/Permit Number: NRC #55-17986-01 Amendment 18

Name of Preceptor
Kab Kyum Kim, MD

Signature


Telephone Number
(340) 776-8331

Date
02/22/2011

RSNA  **Physics Modules**

Certificate of Completion

RSNA/AAPM Physics Module

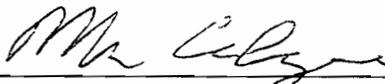
Damian Rudder has completed the RSNA/AAPM Physics Module entitled **Radionuclide Dosimetry and Nuclear Regulations** on **2/16/2011 9:00:36 AM**

The Radiological Society of North America (RSNA) and The American Association of Physicists in Medicine (AAPM) have collaborated to present the RSNA/AAPM Physics Modules.

**Charlotte Kimelman Cancer Institute at
Schneider Regional Medical Center**

Additional Emergency Procedures Training and System review for Unsealed Sources and Manual Brachytherapy. License: US NRC 55-17986-01

	Y	N
Radiation physics and instrumentation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Radiation protection	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Radiation dosimetry and measurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Radioactive source handling	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Performing radiation surveys	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Security of radioactive material	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Procedures to prevent or minimize radioactive contamination and decontamination	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Emergency procedures to control radioactive material	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Trainer:  1/31/2011
Mark Colgan, MS, DABR, AMP
NRC License 55-17986-01

NAME	SIGNATURE	TITLE
Trainee: <u>JAMIAN LUDDER</u>	<u></u>	<u>Medical Physicist</u>

Letter of Attestation
Radiation Safety Officer Training and Supervision

This letter is to attest that in 2005 in addition to HDR specific emergency training meeting requirements 10CFR35.600, I have trained and supervised **Mr. Damian Rudder, M.Sc.** in the radiation safety, regulatory issues, and emergency procedures in the following areas:

10CFR35.100 and 10CFR35.200 - Unsealed Byproduct Material--Written Directive Not Required
10CFR35.300 - Unsealed Byproduct Material--Written Directive Required
10CFR35.400 - Manual Brachytherapy

Specific areas of instruction and experience included:

- Radiation measurements inclusive of check on instrumentation;
- Radioactive material security, inclusive of shipping and handling;
- Procedures to handle and deal with radioactive contamination and decontamination;
- Emergency procedures;
- Regulatory policies and procedures.



Supervisor and Trainer: Amirul Hoque, PhD, DABR

AMP on PA Department of Environmental Protection RML # PA-0042
(Transferred from NRC License # 37-10599-01)