SAINT FRANCIS
Hospital and Medical Center

Department of Radiology

114 Woodland Street
Hartford, Connecticut
06105-1299

860 714-4830

March 9, 2011

MS 16
J-9

Ms. Tara L. Weidner
Health Physicist
U.S. Nuclear Regulatory Commission

RE: Request for Additional Information Concerning Application for Amendment to License No. 06-00854-03, Docket No. 030-01246, Control No. 574455

Dear Ms. Weidner:

Please find below our response to the items listed in your correspondence, wherein you requested additional information to our amendment request for NRC License #06-00854-03.

Item a: Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.

Administratively, Dr. Zamenhof will report to Len Quartararo, Administrative Director, Radiology and Imaging Services and member of the Hospital's RSC. Mr. Quartararo reports directly to Rebecca Burke, Senior VP and CNO. In addition, Robert Falaguerra, Vice President, Facilities, Support Services, Hospital's Safety Officer oversees hospital safety issues including those brought forward from the Radiation Safety Committee and RSO. Radiation Safety and Protection Program issues requiring the attention of Dr. Zamenhof will be addressed via e-mail, telephone, or during the time spent on site. Dr. Zamenhof and Saint Francis Hospital and Medical Center will prepare and sign the "Model Delegation of Authority" letter as found in Appendix I of NUREG 1556, Vol. 9, Rev. 2. A copy of this signed agreement is enclosed for your review.

Item b: Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.

Issues requiring policy implementation or procedural changes will be handled through the Hospital Safety Committee, which the RSC reports to. Mr. Falaguerra chairs the Hospital Safety Committee (HSC) and reports/presents issues requiring attention. Budgetary items and expenditures needed to facilitate the objectives of the radiation safety program and carry out the necessary duties and responsibilities of the RSO will be approved through the Radiology Department, Radiation Oncology Department, or other departments wherein radiation equipment or sources are used.

Item c: Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).

At this time, Dr. Zamenhof has no other responsibilities or duties for any other NRC Radioactive Materials License or any Agreement State licensee. He is contracted to spend one day per week on site at Saint Francis Hospital and Medical Center to fulfill and carry out the RSO duties and responsibilities. Time will be allocated as needed to oversee radiation safety and protection program activities to ensure the safe use of radioactive materials and sources. Other duties include oversight of the personnel monitoring program, ensuring radiation exposures are maintained ALARA, ensuring radiation protection procedures are kept up to date, etc. Other duties and responsibilities of the RSO can be found in Appendix I of NUREG 1556, Vol. 9. Rev. 2.

Item d: Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the RSO with limited authority.

During his time on site, Dr. Zamenhof will work closely with Robert Varsanik, CNMT Nuclear Medicine Supervisor. Mr. Varsanik will serve as a point of contact during the RSO's absence.

Our consulting medical physics service provider, Upstate Medical Physics, P.C., will serve as another point of contact and resource as needed, supporting the RSO. Mr. Varsanik will be allowed to assist the consultant RSO with limited authority.

Item e: Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.

Dr. Zamenhof is reachable via cell phone, e-mail, or long range pager in the event of any emergency or other radiation safety or protection program matter requiring immediate attention. If any issues related to the operation or conduct of the radiation safety program arise, Mr. Varsanik can contact Dr. Zamenhof to initiate attention to these matters. Note that in the case of any emergency requiring the RSO's immediate attention, there are several experienced physicians, medical physicists, and other support staff available on site to receive instructions and initiate corrective action. Dr. Slavin is an experienced physician with extensive radiation safety training and former Chair of the RSC. Ms. Ellen Wilcox, former RSO and Chief Medical Physicist in the Radiation Oncology Department also has several years of experience in radiation safety and protection.

Dr. Zamenhof lives approximately 2 hours from the facility.

If you have any further questions, please contact my office.

Sincerely,

Robert Falaguerra
Vice President,
Facilities, Support Services & Construction
Hospital Safety Officer

SAINT FRANCIS
Hospital and Medical Center

Department of Radiology

111 Woodland Street
Hartford, Connecticut
06105-1209

860 714 4830

TO: Robert Zamenhof, Ph.D., R.S.O

FROM: Robert Falaguerra,
Vice President Facilities, Support Services, Hospital Safety Officer

SUBJECT: Delegation of Authority

You, Robert Zamenhof, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the Radiation Protection Program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of byproduct material by employees who do not meet the necessary requirements and shutting down operations where justified to maintain radiation safety. You are required to notify management if staff does not cooperate and does not address radiation safety issues. In addition, you are free to raise issues with the Nuclear Regulatory Commission at any time. It is estimated that you will spend 6-8 hours per week conducting radiation protection activities.

Robert J Falaguerra — Signature of Administrative Representative

3/9/11 — Date

I accept the above responsibilities,

Robert Zamenhof — Signature of Radiation Safety Officer

3/9/11 — Date

cc: Len Quartararo, Administrative Director, Radiology/Imaging Services
Kathleen Luczyk. CEO Collaborative Laboratories
Ellen Wilcox, Ph.D., Chief Medical Physicist, Radiation Oncology

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

U.S. NUCLEAR REGULATORY COMMISSION

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

Robert G. Zamenhof

Requested Authorization(s) *The license authorizes the following medical uses (check all that apply):*

X 35.100 X 35.200 X 35.300 X 35.400 35.500 X 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

X 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	**I received M.S. and Ph.D. degrees in Applied Radiation Physics and Nuclear Engineering and during the course of study for the Ph.D. degree program, which was in the MIT Dept. of Nuclear Science and Engineering, I attended a large number of classroom and laboratory training sessions in Health Physics.**		
Radiation protection			
Mathematics pertaining to the use and measurement of radioactivity			
Radiation biology	**During my subsequent 30 year career in medical physics and radiation research, I was trained in all aspects of health physics and radiation protection, and also taught this subject to students and radiology and nuclear medicine residents and fellows. I would estimate that my total hours of training in health physics topics well exceeds 200 hours per topic.**		
Radiation dosimetry			
	Total Hours of Training:		

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(3-2009)

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

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

X 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	**During my 18 year tenure at NEMC. from 1978 to 1996, as the director of nuclear medicine and diagnostic X-ray physics, I worked very closely with the health physics and radiation safety office at the institution and was trained by the assistant RSOs during that period.**	
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures	**I also taught radiobiology and radiation safety from both a practical and a regulatory perspective to the department's medical students, residents and fellows.**	
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).

NRC FORM 313A (RSO) U.S. NUCLEAR REGULATORY COMMISSION
(3-2009)

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

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

X 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	**Experience in most of these areas was obtained over a period of 7 years from 1996 to 2003 at the Beth Israel Deaconess Medical Center in Boston**	
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).

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(3-2009)

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

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

X 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	**During my consulting contract with the University of Indiana from 2007 to 2008, as the acting director of proton therapy physics, I was approved by the University and the State of Indiana as the RSO for MPRI under permit #13-32785-01.**	
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).

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(3-2008)

U.S. NUCLEAR REGULATORY COMMISSION

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

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

X 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
NEMC RSO Francis Masse	**License # 68-0263 Broad-Scope & #60-0160 gammaknife**

This license authorizes the following medical uses:

X 35.100	X 35.200	X 35.300	X 35.400
X 35.500	X 35.600 (remote afterloader)		X 35.600 (teletherapy)
X 35.600 (gamma stereotactic radiosurgery)			X 35.1000 (BNCT)

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	**NEMC**	**1978-1996 2003-2007**
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	*	
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	*	
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	*	
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):	*	

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(3-2009)

U.S. NUCLEAR REGULATORY COMMISSION

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

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

Xb. 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
BIDMC RSO Rosenary Kennedy	**License #60-0432 Broad-Scope**

This license authorizes the following medical uses:

X 35.100	X 35.200	X 35.300	X 35.400
X 35.500	X 35.600 (remote afterloader)		X 35.600 (teletherapy)
35.600 (gamma stereotactic radiosurgery)		X 35.1000 (BNCT)	

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	**BIDMC**	**1996-2003**
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	*	
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	*	
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	*	
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):	*	

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

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

X 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
MPRI RSO Mark Wolanski Permit #13-32785-01	

This license authorizes the following medical uses:

X 35.100	X 35.200	35.300	35.400
35.500	35.600 (remote afterloader)		35.600 (teletherapy)
35.600 (gamma stereotactic radiosurgery)		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	**MPRI**	**2007-2008**
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses		
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses		
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		
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):		

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

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

X 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

NEMC RSO Francis Masse License # 68-0263 Broad-Scope & #60-0160 gammaknife

License/Permit lists supervising individual as:

X Radiation Safety Officer Authorized User Authorized Nuclear Pharmacist

Authorized Medical Physicist

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

X 35.100 X 35.200 X 35.300 X 35.400

X 35.500 X 35.600 (remote afterloader) X 35.600 (teletherapy)

X 35.600 (gamma stereotactic radiosurgery) X 35.1000 (**BNCT**)

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 _____ 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

X 2. Structured Educational Program for Proposed Radiation Safety Officers

X I attest that **Robert Zamenhof** 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

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

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

X 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

BIDMC RSO Rosenary Kennedy License #60-0432 Broad-Scope

License/Permit lists supervising individual as:

X Radiation Safety Officer Authorized User Authorized Nuclear Pharmacist

Authorized Medical Physicist

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

X 35.100 X 35.200 X 35.300 35.400

X 35.500 X 35.600 (remote afterloader) X 35.600 (teletherapy)

35.600 (gamma stereotactic radiosurgery) X 35.1000 (BNCT)

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

X I attest that **Robert G. Zamenhof** 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

X 2. Structured Educational Program for Proposed Radiation Safety Officers

X I attest that **Robert G. Zamenhof** 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

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(3-2009)

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

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

X 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

MPRI RSO Mark Wolanski Permit #13-32785-01

License/Permit lists supervising individual as:

X Radiation Safety Officer Authorized User Authorized Nuclear Pharmacist

Authorized Medical Physicist

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

X 35.100 X 35.200 X 35.300 35.400

35.500 35.600 (remote afterloader) X 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 _____ 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

X 2. Structured Educational Program for Proposed Radiation Safety Officers

X I attest that **Robert G. Zamenhof** 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

NRC FORM 313A (RSO) U.S. NUCLEAR REGULATORY COMMISSION
(3-2009)

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 responsibilties

AND

Second Section
Complete for all *(check all that apply)*:

X I attest that **Robert G. Zamenhof** has training in the radiation safety, regulatory issues, and
Name of ProposedRadiation Safety Officer

emergency procedures for the following types of use:

X	35.100	
X	35.200	
X	35.300	oral administration of less than or equal to 33 millicuries of sodium iodide I-131, for which a written directive is required
X	35.300	oral administration of greater than 33 millicuries of sodium iodide I-131
X	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
X	35.400	
	35.500	
X	35.600	remote afterloader units
	35.600	teletherapy units
	35.600	gamma stereotactic radiosurgery units
X	35.1000	emerging technologies, including: **BNCT** **Proton Beam Radiotherapy**

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(3-2009)

U.S. NUCLEAR REGULATORY COMMISSION

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

AND

Third Section
Complete for ALL

|✔| I attest that **Robert Zamenhof, Ph.D.** 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 **St Francis Hospital and Medical Center**
Name of Facility

License/Permit Number: **06-00854-03**

Name of Preceptor	Signature	Telephone Number	Date
Gregory Hisel		**518-755-7465**	3/4/11