



July 29, 2011

Bill Reichhold
US Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

Control No. 575344
Request for Change of Control of Cardiovascular Specialists, PC (License 21-20324-01)

Dear Mr. Reichhold,

This is in response to the facsimile dated July 28, 2011 (see attachment).

Description of Availability of the Radiation Safety Officer (RSO)

Cheryl Culver Schultz is currently listed as the Corporate Radiation Safety Officer on one NRC license: Beaumont Health System broad scope medical license (21-01333-01). Janice Campbell, Ph.D. is a board certified medical physicist and the corporate nuclear medicine physicist for Beaumont Health System. Janice Campbell, Ph.D. is listed on License 21-01333-01 as the Assistant Radiation Safety Officer, and serves as the RSO Designate for Nuclear Medicine. At the time of transfer of change of control, Cardiovascular Specialists Beaumont will retain quarterly consultant physics services. In the future, Beaumont Health System will be recruiting, hiring and training an additional medical physicist/RSO Designate to cover nuclear medicine and nuclear cardiology at the off-site locations listed on license 21-01333-01 and 21-20324-01. At the time of transfer of change of control and until the additional medical physicist is on staff and trained, Cardiovascular Specialists Beaumont will retain quarterly consultant physics services.

- a. Amount of time spent each week – Cheryl Culver Schultz and/or Janice Campbell will conduct compliance audits, monitor radiation dose reports, and perform quality assurance reviews as needed and at least annually. Initially, Cheryl Culver Schultz will spend more time on site at Cardiovascular Specialists Beaumont to fulfill the responsibilities of new Radiation Safety Officer. Thereafter, the amount of time spent on location at Cardiovascular Specialists Beaumont is estimated to be 0.5 hour per week. This includes transportation time.
- b. Amount of time necessary for Cheryl Culver Schultz or Janice Campbell to respond to an emergency is 17 – 20 minutes depending on traffic flow. Cardiovascular Specialists Beaumont provides nuclear cardiology imaging on Mondays through Fridays, during normal business hours only. The time is based on driving from Beaumont Hospital Royal Oak to Cardiovascular Specialists Beaumont.
- c. Cheryl Culver Schultz is employed full time as the Corporate RSO for Beaumont Health Systems and is listed as the Radiation Safety Officer on one NRC License (21-01333-01). Licensed activities are conducted at 3 hospitals: Royal Oak, Troy and Grosse Pointe; and at six locations that are not part of the hospitals' campuses. One full time FTE radiation safety coordinator and one 0.5 FTE radiation safety technician directly report to the Corporate RSO. At this time, consultant physics services are retained to provide coverage for Grosse Pointe Hospital and Saint Clair Shores Beaumont Medical Center. To ensure that Cheryl Culver Schultz fulfills the duties as RSO at Cardiovascular Specialists, additional consultant physics services may be retained to provide

coverage for other licensed locations until another Beaumont medical physicist/RSO Designate becomes available.

- d. No adverse impact is expected from Cheryl Culver Schultz assuming the responsibility as RSO at Cardiovascular Specialists Beaumont for the following reasons: (1) retention of consultant physics services and direct communication of the consultant physics reports to the RSO, (2) radiation badge dose reports will be sent directly by Landauer to the RSO for review, (3) board eligible or board certified nuclear technologists are employed who are trained to handle a spill, and to report spills and other deviations directly to the RSO or Assistant RSO. The RSO and Assistant RSO cover for each other, so one is available to respond at all times.
- e. The RSO divides time to adequately perform the duties of the Beaumont Health System RSO based on radiation risk to the patients, visitors and staff. Hospitals and licensed off-sites that handle therapeutic amounts of radiopharmaceuticals (or > 30 uCi of I-131), brachytherapy, PET imaging facilities, and radiopharmacies using Mo-99/Tc-99m generators are higher risk and require more RSO time. Low risk areas, such as Cardiovascular Specialists, that use only diagnostic doses of Tc-99m limited to cardiovascular clinical studies, require significantly less time.

Status of Surveillance Program

The status of the surveillance program will be current at the time the control is transferred from Cardiovascular Specialists, P.C. to Beaumont Health System.

Records of Safe and Effective Decommissioning

No decommissioning at Cardiovascular Specialists, PC will be conducted at the time the control is transferred to Beaumont Health Systems. With regard to the exemption for effluent and disposal records, Beaumont Health System will arrange for the transfer and maintenance of records important to the safe and effective decommissioning of the licensed activities at Cardiovascular Specialists.

Please call me at 248-551-0538 if you have any questions.

Sincerely,



Cheryl Culver Schultz, M.S.
Corporate Radiation Safety Officer
Beaumont Health System

The following additional information is needed to review the request to change the control of Cardiovascular Specialists, P.C. (License 21-20324-01).

Radiation Safety Officer Availability

The proposed new Radiation Safety Officer for Cardiovascular Specialists, P.C. is listed as the Radiation Safety Officer on other NRC licenses. We need additional information regarding the Radiation Safety Officer's availability to oversee the radiation safety program at Cardiovascular Specialists, P.C.

Please describe the availability of the Radiation Safety Officer (RSO):

- a. Please describe the amount of time each week Cheryl Culver Schultz, M.S. (new RSO) will spend at the Cardiovascular Specialists, P.C. located at 29645 14 Mile Road, Farmington Hills, Michigan, performing the duties of the RSO.
- b. Please indicate the amount of time it will take for Cheryl Culver Schultz, M.S. (new RSO) to respond to an emergency involving radioactive materials when the new RSO is not at Cardiovascular Specialists, P.C. located at 29645 14 Mile Road, Farmington Hills, Michigan.
- c. Please describe any previous commitments Cheryl Culver Schultz, M.S. (new RSO) has as the RSO and/or authorized user at any other NRC licensed facility and describe the impact this will have on the duties as the RSO at Cardiovascular Specialists, P.C. located at 29645 14 Mile Road, Farmington Hills, Michigan.
- d. Since Cheryl Culver Schultz, M.S. (new RSO) will be the RSO at multiple facilities, please describe any adverse impact this will have on the duties as the RSO at Cardiovascular Specialists, P.C. located at 29645 14 Mile Road, Farmington Hills, Michigan. If there will be no adverse impact, please state so, and why.
- e. Please describe how Cheryl Culver Schultz, M.S. (new RSO) will divide time among multiple facilities so that the RSO will be able to adequately perform the duties as the Radiation Safety Officer at Cardiovascular Specialists, P.C. located at 29645 14 Mile Road, Farmington Hills, Michigan.

Status of Surveillance Program

Please confirm that the status of the surveillance program will be current at the time the control is transferred from Cardiovascular Specialists, P.C. to Beaumont Health Systems.

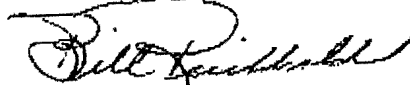
Records of Safe and Effective Decommissioning

Please confirm that all records concerning the safe and effective decommissioning of Cardiovascular Specialists, P.C.'s facility will be transferred to Beaumont Health Systems when control is transferred to Beaumont Health Systems. If there was no decommissioning performed at Cardiovascular Specialists, P.C. please state so. Please clarify the exemptions for effluent and disposal records.

Please send a facsimile (630- 515-1078) of your response to the above within 7 days and refer to control 575344. Please call me at 630-829-9839 if you have any questions.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this facsimile and the attached documents will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

From the desk of:



Bill Reichhold



CHERYL CULVER SCHULTZ, M.S.
Radiation Safety Officer
 3601 W. 13 Mile Rd.
 Royal Oak, MI 48073-6769
 248-551-0548
 Fax: 248-551-8297

Fax

<i>To:</i>	Bill Reichhold	<i>From:</i>	Cheryl Culver Schultz, M.S.
<i>Fax:</i>	630-515-1078	<i>Pages:</i>	5 , including cover page
<i>Phone:</i>	630-829-9839	<i>Date:</i>	July 29, 2011
<i>Re:</i>	Control No. 575344	<i>CC:</i>	

Urgent *For Review* *Please Comment* *Please Reply* *x As Requested*

● *Comments:*

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