MERCY
ST. JOHN'S
REGIONAL MEDICAL CENTER

2727 McCLELLAND BOULEVARD ■ JOPLIN, MISSOURI 64804-1694
417-781-2727 ph.

U. S. Nuclear Regulatory Commission
Region III
Materials Licensing Section
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532

License Number 24-01090-03 SJRMC-Field Hospital

Dear Materials Licensing Section:

This letter is submitted for compliance with Sections 35.13 and 35.14 noting the following three items:

1. For compliance with 35.14(b)(1), Leslie Behm, M.S., has permanently discontinued her duties as Radiation Safety Officer under our RAM License.

2. For compliance with 35.14(2), Duane Eugene Myers M.D., is acting as our Temporary RSO until he can be listed as permanent RSO on our license.

3. For compliance with 35.13(c), we request a change in RSO that names Duane Eugene Myers, M.D., as RSO on our license. Dr. Myers meets the RSO training requirements for an AU listed on our license under 35.50(c) (2). Attached is completed NRC FORM 313A (RSO) for Dr. Myers and his appointment as RSO by Administration and his acceptance of RSO. Dr. Myers has been a past Chairman of our Radiation Safety Committee and is a member of the radiation safety committee.

If you have any questions regarding this notification, please contact Whit Sanders, Manager Radiation Oncology at (417) 437-2337 (cell phone).

Sincerely,

Dottie Bringle
Signature

Dottie Bringle
Name

COO/CNO
Title

8/19/11
Date

Attachments

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Duties and Responsibility of the Radiation Safety Officer as authorized under §35.24(c).

The Radiation Safety Officer(RS0) is responsible for implementing the radiation safety program. The licensee, through the Radiation Safety Officer, shall ensure that radiation safety activities are being performed in accordance with approved procedures and regulatory requirements in the daily operation of the licensee's Radioactive Material Program.

The duties and responsibilities of the Radiation Safety Officer will include ensuring the following:

- Stopping unsafe activities involving licensed material;
- Radiation exposures are ALARA;
- Up-to-date radiation protection procedures in the daily operation of the licensee's byproduct material program are developed, distributed, and implemented;
- Possession, use, and storage of licensed material is consistent with the limitations in the license, the regulations, the SSDR Certificate(s), and the manufacturer's recommendations and instructions;
- Individuals installing, relocating, maintaining, adjusting, or repairing devices containing sealed sources are trained and authorized by an NRC or Agreement State license;
- Personnel training is conducted and is commensurate with the individual's duties regarding licensed material;
- Documentation is maintained to demonstrate that individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits or that personnel monitoring devices are provided;
- When necessary, personnel monitoring devices are used and exchanged at the proper intervals, and records of the results of such monitoring are maintained;
- Licensed material is properly secured;
- Documentation is maintained to demonstrate, by measurement or calculation, that the total effective dose equivalent to the individual likely to receive the highest dose from the licensed operation does not exceed the annual limit for members of the public;

- Proper authorities are notified of incidents such as loss or theft of licensed material, damage to or malfunction of sealed sources, and fire;
- Medical events and precursor events are investigated and reported to NRC, and cause(s) and appropriate corrective action(s) are identified, and timely corrective action(s) are taken;
- Audits of the radiation protection program are performed at least annually and documented;
- If violations of regulations, license conditions, or program weaknesses are identified, effective corrective actions are developed, implemented, and documented;
- Licensed material is transported, or offered for transport, in accordance with all applicable DOT requirements;
- Licensed material is disposed of properly;
- Appropriate records are maintained; and
- An up-to-date license is maintained and amendment and renewal requests are submitted in a timely manner.

I accept the duties and responsibilities of the Radiation Safety Officer for St. John's Regional Medical Center, Lic. No. 24001090-03.

Duane Myers, MD.
Authorized User: 35.300 and 35.400

Administration of St. John's Regional Medical Center appoints Dr. Myers as Radiation Safety Officer.

Management Representative

8/19/11
Date

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

APPROVED BY OMB: NO. 3150-0120
EXPIRES: 3/31/2012

RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION [10 CFR 35.50]

Name of Proposed Radiation Safety Officer

Duane E. Myers, M.D.

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:			

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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).

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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:

☐ 35.100 ☐ 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	St. John's Regional Medical Center - Joplin, MO Current member of RSC, Past Chairman of RSC, AU 35.300 & 35.400.	January 2005 thru July 2011
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	St. John's Regional Medical Center - Joplin, MO Current member of RSC, Past Chairman of RSC, AU 35.300 & 35.400.	January 2005 thru July 2011
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	St. John's Regional Medical Center - Joplin, MO Current member of RSC, Past Chairman of RSC, AU 35.300 & 35.400.	January 2005 thru July 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		
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)

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

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. 24-01080-03

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

☐ **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

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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 **Duane E. Myers, M.D.** 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 **Duane E. Myers, M.D.** 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:

_____
_____
_____

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(3-2009)

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

AND

Third Section
Complete for ALL

☑ I attest that Duane E. Myers, M.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 SJRMC - Field Hospital
Name of Facility

License/Permit Number: 24-01090-03

Name of Preceptor	Signature	Telephone Number	Date
Leslie Behm, M.S.		417-820-2468	8-18-11

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2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

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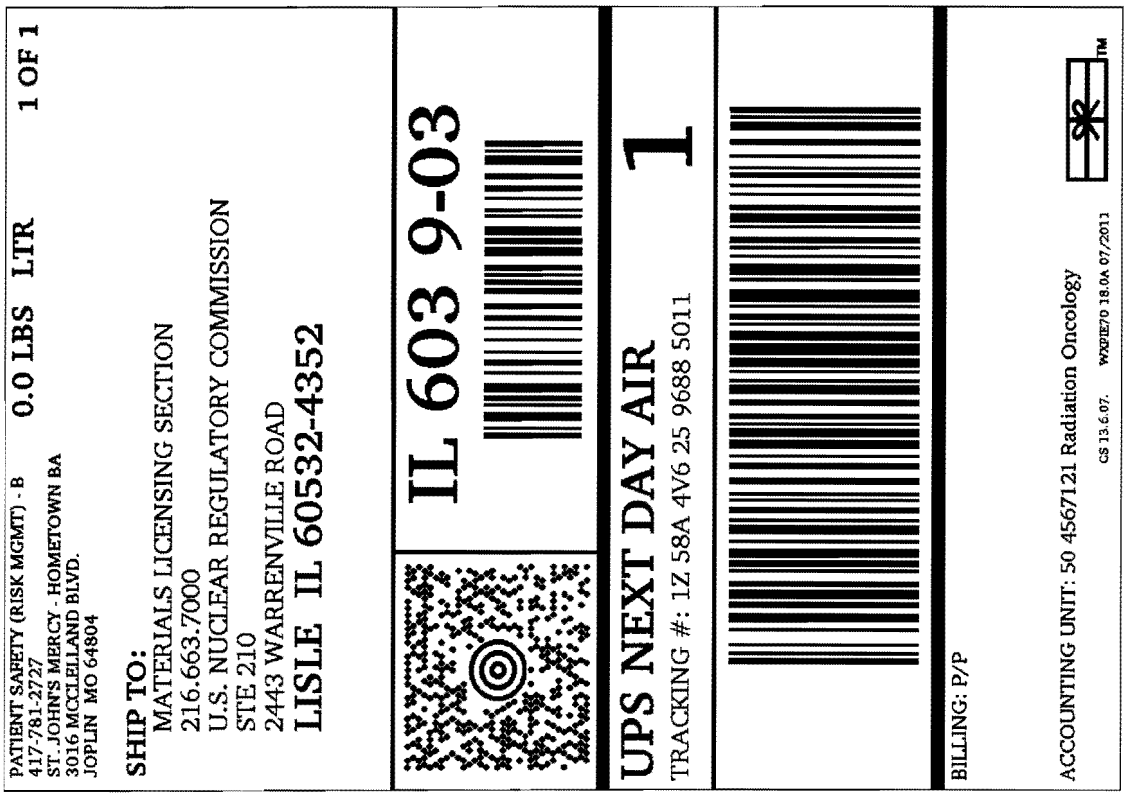
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