Indiana University Health

Materials Licensing Branch
US Nuclear Regulatory Commission, Region III
2443 Warrenville Rd., Ste 210
Lisle, IL 60532-352

Reference: Control number 317354
License Number 13-32087-01
Docket number 03-34812

Sirs,

The licensee, Indiana University Health Arnett, Inc., seeks to amend the above referenced license. Please remove Phil H. Dittmer, PH.D. as the Radiation Safety Officer on the license and replace him with Douglas M. Frye. Ph.D. as the licensee's RSO effective June 1, 2012. Dr. Frye will conduct his duties according to the attached memorandum of understanding and delegation of authority.

Sincerely,

Penny Peterson
Practice Manager, Oncology Services
Indiana University Health Arnett

In support of the Indiana Health University Arnett, Inc. license amendment request, I accept the position as Radiation Safety Officer.

Douglas M. Frye, Ph.D., DABR
Indiana University Health Arnett
420 N. 26th St.
Lafayette, IN 47904
765-448-7534|317.312.6903PG|765-448-7964FX|317-962-3549VM
dfrye@iuhealth.org

IU Health Arnett
P.O. Box [illegible]
Lafayette, IN [illegible]

T 765-448-[illegible]
iuhealth.org

Indiana University Health

Memorandum of Understanding and Delegation of Authority

The RSO is responsible for day-to-day oversight of the Radiation Protection Program. In accordance with 10 CFR 35.24, the licensee, the Indiana University Health Arnett, Inc., shall provide the RSO sufficient authority, organizational freedom, time, and resources to perform his/her duties. Additionally, the RSO shall have a sufficient commitment from management to fulfill the duties and responsibilities specified in 10 CFR 35.24 to ensure that radioactive materials are used in a safe manner.

The RSO duties and responsibilities shall include, but not necessarily be limited to, ensuring the following:

- Unsafe activities involving licensed materials are stopped;
- Radiation exposures are ALARA;
- Material accountability and disposal;
- Interaction with NRC;
- Timely and accurate reporting and maintenance of appropriate records;
- Annual program audits;
- Proper use and routine maintenance;
- Personnel training; and
- Investigation of incidents involving byproduct material (e.g., medical events).

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

Douglas M. Frye

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:			

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)

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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(3-2009)

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		
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)

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.

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

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

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 Douglas M. Frye 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 Douglas M. Frye has training in the radiation safety, regulatory issues, and
Name of ProposedRadiation 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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RADIATION SAFETY OFFICER TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

AND

Third Section
Complete for ALL

☑ I attest that Douglas M. Frye (Name of Proposed Radiation Safety Officer) has achieved a level of radiation safety knowledge 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 Indiana University Health Arnett, Inc (Name of Facility)

License/Permit Number: 13-32087-01

Docket no 03-34812

Name of Preceptor	Signature	Telephone Number	Date
Phil H. Dittmer, Ph. D.	Phil H. Dittmer	(317) 944-3524	29 May 2012

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Indiana University Health

Facsimile originating from: Indiana University Health
PO Box 5545
Lafayette, IN 47903
765.448.8000

Please deliver to: Sara Forester

FAX Number: 630-575-1078

From: Douglas Frye

Date: 5/30/12 6/5/2012

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