



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

MAY 30 2012

Lawrence Ricci, D.O.
Radiation Safety Officer
Truman Medical Center
2301 Holmes Street
Kansas City, MO 64108

Dear Dr. Ricci:

Enclosed is Amendment No. 31 to your NRC Material License No. 24-25816-01 in accordance with your request. Please note that the changes made to your license are printed in **bold font**.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

At this time we were unable to approve Stephanie Reid, M.D. as an authorized user for the use of materials in 10 CFR 35.394, because the information in your letter dated March 1, 2012, was insufficient to complete our review.

If you wish to pursue this matter please submit a written response to the following information request, addressed to my attention as "additional information to control number 577090" to facilitate proper handling in our offices.

Your letter dated March 1, 2012, requested that Dr. Reid be approved as an authorized user (AU) for "levels 35.190, 35.290 and 35.390 as it pertains to the information provided."

We approved Dr. Reid for the use of materials in sections 10 CFR 35.100, 35.200 and 35.392. Authorization for materials in 10 CFR 35.392 is for the oral administration of iodine-131 in quantities less than 33 millicuries.

Dr. Reid's specialty board certification was obtained in June 2010, which was one year prior to the June 2011 date when her specialty board certification became acceptable as the primary qualification for the use of materials in 10 CFR 35.394.

Please see this link on our website:

<http://www.nrc.gov/materials/miau/med-use-toolkit/spec-board-cert.html>

Since Dr. Reid's submitted credentials did not request or support the parenteral administration of any licensed materials (such as those in 10 CFR 35.396) and since we were able to approve her for the use of materials in 10 CFR 35.392, that leaves only the

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materials in 10 CFR 35.394 for her to demonstrate compliance with in her training and experience.

Although she presented her participation in at least three patient cases involving the oral administration of iodine-131 in quantities greater than or equal to 33 millicuries, there was an error on her preceptor forms on Form 313a (AUT), Part II, First Section. The error consisted of Dr. Ricci's name being entered where Dr. Reid's name should have been entered.

In addition, the training and experience information on Form 313a (AUT), Part I was mostly left blank. Since Dr. Reid's specialty board certification was not acceptable in the year obtained for the use requested, it will be necessary to have Part 1 completed to demonstrate compliance with 10 CFR 35.394(c)(1), 35.394(c)(2) and 35.394(c)(3).

Dr. Reid's preceptor forms must then be currently signed and dated and accompanied by an appropriate business letter signed by a senior management official, per 10 CFR 35.12(a). Please follow the rest of our instructions above also. We will then continue our review.

We noted that your letter's attachments included partially redacted patient records to support Dr. Reid's training and experience. Please note that the redaction was insufficient to fully obliterate the patients' names and we are protecting this information in accordance with 10 CFR 2.790.

However, in the future, please refrain from submitting extraneous documents, such as patient records, college transcripts, etc. that may contain personally identifiable information that we must then protect.

In addition, we noted that your license currently authorizes an RSO and an "Assistant RSO, Gerald E. Finke, D.O."

Please be advised that NRC can no longer authorize more than one RSO on specific licenses of limited scope. The current designation was made as a result of a misunderstanding on our part a number of years ago and may not continue.

Pursuant to 10 CFR 35.24, only one RSO can be named to this license.

In your next amendment, please request the removal of Dr. Finke as your Assistant RSO.

Please also be reminded of the provisions in 10 CFR 30.9(a), "Completeness and accuracy of information,"...(a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

If you have any questions concerning this amendment please contact me at either (630) 829-9841 or (800) 522-3025, ext. 9841. My fax number is 630-515-1078.

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In accordance with 10 Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions.

Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

The NRC's Safety Culture Policy Statement became effective in June 2011.

While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture.

You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at:

<http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Sincerely,



Colleen Carol Casey
Materials Licensing Branch

License No. 24-25816-01

Docket No. 030-30130

Enclosure:

Amendment No. 31