



RECEIVED

JUL 2 3 2012

DNMS

Nuclear Materials Licensing Branch U.S. Nuclear Regulatory Commission, Region IV 1600 E. Lamar Boulevard Arlington, TX 76011-4511

SUBJECT: Addition of Authorized Users to RAM License # 50-27730-01

Please let this letter serve as our request for an amendment to add two additional radiologists as "Authorized Users" to Radioactive Materials License 50-27730-01 for Imaging Associates of Providence. The required materials are enclosed with this letter to add Dr. Scott Naspinsky and Dr. Christopher Reed to our license for Schedule 35.100, 35.200, and 35.300 (for I-131 less than 33 mCi only) isotopes.

Any questions in regards to this amendment request should be directed to Marcelle Riddle at 907-301-1785 or at 907-357-1220.

Thank you,

July 19, 2012

1. Keith Radecic, CEO

Imaging Associates of Providence

**PUBLIC** 

☐ Immediate Release

Normal Release

**NON-PUBLIC** 

☐ A.3 Sensitive-Security Related

☐ A.7 Sensitive Internal

Other:

Reviewer:

Date: 7/24/12

# NRC FORM 313A

U.S. NUCLEAR REGULATORY COMMISSION

(10-2005)

# MEDICAL USE TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 10/31/2008

# PART I -- TRAINING AND EXPERIENCE

**Note:** Descriptions of training and experience must contain sufficient detail to match the training and experience criteria in the applicable regulation (10 CFR Part 35)

1. Name of Individual, Proposed Authorization (e.g., Radiation Safety Officer), and Applicable Training Requirements (e.g., 10 CFR 35.50)

Scott Naspinsky

For Physicians, Podiatrists, Dentists, Pharmacists -- State or Territory Where Licensed NH, AK

### 3. CERTIFICATION

- a. Provide a copy of the board certification. (Stop here if applying under 10 CFR Part 35, Subpart J or 35.590(a); continue if applying under other subparts.)
- Provide documentation in appropriate items 4 through 10 of training or clinical case work required by 35.50(e); 35.51(c); 35.290(c)(1)(ii)(G) for AU seeking 35.200 authorization; 35.390(b)(1)(ii)(G); 35.396(d)(1) and 35.396(d)(2); 35.590(c); or 35.690(c).
- c. Provide completed Part II Preceptor Attestation, Items 11a through 11d.
  Stop here after completing items 3a, 3b, and 3c when using board certification to meet 10 CFR

Stop here after completing items 3a, 3b, and 3c when using board certification to meet 10 CFR Part 35 training and experience requirements.

- 4. INDIVIDUALS IDENTIFIED ON A LICENSE OR PERMIT AS RADIATION SAFETY OFFICERS (RSO), AUTHORIZED USERS (AU), AUTHORIZED MEDICAL PHYSICISTS (AMP), OR AUTHORIZED NUCLEAR PHARMACISTS (ANP) SEEKING ADDITIONAL AUTHORIZATIONS
- a. Provide a copy of the license or broadscope permit listing the current authorization and (b) or (c)
- b. Complete items 6c (and 10 when training is provided by an RSO, AMP, ANP, or AU) and preceptor items 11b through 11d to meet requirements for: RSO in 35.50(c)(2) or 35.50(e); or AU in 35.290(c)(1)(ii)(G) or 35.390(b)(1)(ii)(G) or 35.590(c) or 35.690(c); or AMP under 35.51(c).

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c. Complete items 5, 6a, 6b, 10, and Preceptor items 11a through 11d to meet AU requirements in 35.396(a).

Description of Training	Location	Clock Hours	Dates of Training
Radiation Physics and Instrumentation	Dartmouth Hitchcock Medical Center	100	2002-2006
Radiation Protection	Dartmouth Hitchcock Medical Center	30	2002-2006
Mathematics Pertaining to the Use and Measurement of Radioactivity	Dartmouth Hitchcock Medical Center	20	2002-2006
Radiation Biology	Dartmouth Hitchcock Medical Center	20	2002-2006
Chemistry of Byproduct Material for Medical Use	Dartmouth Hitchcock Medical Center	32	2002-2006
OTHER			
		1	577916

(10-2005)

MEDICAL USE TRAINING AND EXPERIENCE AND PRECEPTOR ATTESTATION (continued)

6a. WORK OR PRA	ACTICAL EXPERIENCE WIT	H RADIATION	
Description of Experience	Name of Supervising Individual(s)	Location and Corresponding Materials License Number	Dates and/or Clock Hours of Experience

Medical Center

130-R

2002-2006 Ordering, receiving and unpacking radioactive Alan Siegel Dartmouth Hitchcock materials safely and performing the realted radiation Medical Center 130-R surveys. 2002-2006 Dartmouth Hitchcock Alan Siegel Using administrative controls to prevent a medical

event involving the use of unsealed byproduct 130-R material. Dartmouth Hitchcock 2002-2006 Alan Siegel Administering dosages of radioactive drugs to Medical Center patients or human research subjects

Dartmouth Hitchcock 2002-2006 Eluting generator systems, measuring and testing Alan Siegel Medical Center the eluate for radionuclidic purity, processing the 130-R eluate with reagent kits.

6b. SUPERVISED CLINICAL CASE EXPERIENCE (describe experience elements in 6a)

Radionuclide	Type of Use	No. of Cases Involving Personal Participation	Name of Supervising Individual	Location and Corresponding Materials License Number	Dates and/or Clock Hours of Experience
Tc-99m	Diagnostic	1438	Alan Siegel	DHMC 130-R	2002-2006
I-131	Diagnostic	39	Alan Siegel	DHMC 130-R	2002-2006
I-123	Diagnostic	10	Alan Siegel	DHMC 130-R	2002-2006
I-131	hyperthyroid Rx, ca Rx	24, 3	Alan Siegel	DHMC 130-R	2002-2006
In-111	tumor, WBC	18	Alan Siegel	DHMC 130-R	2002-2006
TI-201	brain, cardiac	635	Alan Siegel	DHMC 130-R	2002-2006
F-18	PET	400	Alan Siegel	DHMC 130-R	2002-2006
Mo-99	generator	10	Alan Siegel	DHMC 130-R	2002-2006

RC FORM 313A 0-2005) MEDICAL USE TR	RAINING AND EXPERIEN	CE AND PRECEPTO	U.S. NUCLEAR REGULATORY COMMISSION OR ATTESTATION (continued)
	AINING FOR SECTIONS 3		
Training Element	Type of	f Training *	Location and Dates
vendor training.			51(c), and 35.690(c)), didactic, or
7. FORMAL TRAINING  Degree, Area of Study or Residency Program	Name of Program and Location with Corresponding Materials License Number	1	Name of Organization that Approved the Program (e.g., Accreditation Council for Graduate Medical Education) and the Applicable Regulation (e.g., 10 CFR 35.490)
Diagnostic Radiology	Dartmouth Hitchcock Medical Center Lebanon, NH 130-R	7/2002-6/2006	ACGME
8. RADIAT	TION SAFETY OFFICER (F	RSO) ONE-YEAR F	ULL-TIME EXPERIENCE
YES Completed 1 yea	ar of full-time radiation safe	the RSO for Licens	as identified in item 6a) under supervison. se No.
9. MEDICA!	L PHYSICIST ONE-YEA	R FULL-TIME TRAIN	IING/WORK EXPERIENCE
N/A (35.961) or medi	lical physics (35.51) under t	the supervision of	6a) in therapeutic radiological physics uthorized Medical Physicists (35.51);
		and	
N/A and for topics ide	lentified in item 6a) for (spec	ecify use or device)	ling radiation therapy services described
under the super requirements for	vision of		s a medical physicist (35.961) or meets use or device)
104011011101101	, , , , , , , , , , , , , , , , , , , ,	, , , , , , ,	h 577916

NRC FORM 313A	U.S. NUCLEAR REGULATORY COMMISSION
MEDICAL USE TRAINING AND E.	XPERIENCE AND PRECEPTOR ATTESTATION (continued)
10. SUPERVISING INDIV	IDUAL IDENTIFICATION AND QUALIFICATIONS
individual is needed to meet requirements in 10	as obtained under the supervision of (if more than one supervising ) CFR Part 35, provide the following information for each):
	Supervisor is:
: Alan Siegel	Authorized User Authorized Medical Physicist
· ·	Radiation Safety Officer Authorized Nuclear Pharmacist
C. Supervisor meets requirements of Part	35, Section(s) 190, 290, 390, 392
The state of the s	190, 290, 390, 392
D. Address Dep't of Radi.	C Materials Liegans Number
DHAC I nedical Ceu Lebanon, NH	
1.35×3/10	II PRECEPTOR ATTESTATION
Note: This part must be completed by the inc	dividual's preceptor. If more than one preceptor is necessary to document or statement from each. This part is not required to meet training
I attest the individual named in Item 1:	
11a has satisfactorily completed the req	uirements in Part 35, Section(s) and Paragraph(s) 190, 270, 370, 3
as documented in section(s)	
11b. Select one	
	0(e) 35.51(c) 35.390(b)(1)(ii)(G) 35.690(c) for
	etion(s) of this form.
11c.  has achieved a level of competency	y sufficient to independently operate a nuclear pharmacy (for 35.980); <b>O</b> f
has achieved a level of competency	y sufficient to function independently as an authorized for 35.100, 200, 300 uses (or units); <b>Or</b>
has achieved a level of radiation sa	fety knowledge sufficient to function independently as a Radiation Safety
Officer for a medical use licensee ;	
□ N/A	
11d. I am an Authorized Nuclear Pharmacis	st; <b>or</b> I am a Radiation Safety Officer; <b>or</b>
I meet the requirements of 100/2	section(s) of 10 CFR Part 35
or equivalent Agreement State require	ments to be a preceptor AU or AMP
for the following byproduct material us	ses (or units):
A. Address	B. Materials License Number
i Hedical Cente	r yr.
Lebanon, UH	0375h 130-R
C. NAME OF PRECEPTOR (print clearly)	D. SIGNATURE PRECEPTOR E. DATE
Alan Sienel	
· /	PAGE 4

# RADIOACTIVE MATERIAL PERMIT

Page 1 of 4

USAF RADIOISOTOPE COMMITTEE

Pursuant to the authority stated in AFI 40-201, Managing Radioactive Materials in the USAF, and in reliance on statements made by the applicant, permission is hereby granted to receive, possess, transfer and store radioactive materials listed below, and to use this material for the purpose and at the places listed below. This document is not a valid permit unless it is endorsed by a representative of the USAF

Radioisotope Committee.				3. AMENDMENT NO.
1. ORGANIZATION		2. PERMIT NO.	0.00 - 100	3, AMENUMENT NV.
3 MDOS/CC		AK-01810-0	2/0/AFP	7
5955 ZEAMER AVE		4. EXPIRATION	DATE	
ELMENDORF AFB AK 995	306-3700	31-May-200	9	
Action Table to the service of the s		5. DOCKET NO.		
		030-22254		
6. PERMIT RSO:		7. ALTERNATE	PERMIT RSO:	1
JOEL T. SWIDERSKI,		BRIAN S. N		
8. RADIOACTIVE MATERIAL	9. CHEMICAL/PHYSICAL FORM (NS)	v or Model Number)	10. MAXIMUM	QUANTITY AUTHORIZED
(Element and Mass Numbers)	(* Denotes sealed sources)			
A. Any byproduct material permitted by 10 CFR 35.100	A, Any		A. As needed	
B. Any hyproduct material permitted by 10 CFR 35,200, except Xenon-133	B. Any		B. As needed	, .
C. Any sodium iodide (I-131) byproduct material permitted by 10 CFR 35,300	C. Any		C. 120 million	aries
D. Any accelerator produced diagnostics radio- pharmaceutical, except Nenon-127	D. Any IND or FDA approve radiopharmaceutical	đ	D. As needed	
E. Any accelerator produced diagnostic calibration standard	E. Any			, not to exceed 20 ger source

# 11. AUTHORIZED USE

- A. Medical use for uptake, dilution, and excretion studies permitted by 10 CFR 35.100
- B. Medical use for imaging and localization studies permitted by 10 CFR 35.200
- C. Medical use for which the patient can be released under the provisions of 10 CFR 35.75 and for which a written directive is required per 10 CFR 35.300.
- D. Medical use
- E. Calibration

# 12. AUTHORIZED USERS

NAME

Jason H. Eves, M.D.

Scott R. Naspinsky, M.D. Christopher M. Reed, M.D.

# AUTHORIZED USE

Items 11 A, B, C, D, E

Items 11 A, B, C, D, E

Items 11 A, B, C (Oral administration of sodium iodide 1-131, only), D, E

### CONDITIONS

- The authority for this permit is US Nuclear Regulatory Commission (NRC) Master Material License No. 42-23539-01AF issued to the USAF Radioisotope Committee and AFI 40-201. Managing Radioactive Materials in the USAF.
- 14. The permittee shall comply with the provisions of Title 10, Chapter 1, Code of Federal Regulations, Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations," Part 20, "Standards for Protection Against Radiation," and Part 35, "Medical Use of Byproduct Material," except that all reports required by those parts must be made to the USAF Radioisotope Committee Secretariat. In addition, the permittee shall comply with all instructions and directives of the USAF Radioisotope Committee necessary to insure compliance.
- Permitted material shall be used or stored only at the permittee's hospital, rooms 1D170, 1D171, 1D172, 1D174, 1D175, 1D176, ID177, 1D179 located at Elmendorf AFB AK.

# RADIOACTIVE MATERIAL PERMIT USAF RADIOISOTOPE COMMITTEE SUPPLEMENTARY

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- 16. A. In addition to the possession limits in item #10, the permittee shall further restrict the possession of sealed sources of permitted byproduct to quantities below 10E10 times the quantity specified in 10 CFR 30 Appendix B for establishing decommissioning financial assurance. If two or more radionuclides are possessed, the possession limit is determined as follows: for each radionuclide, determine the ratio of the quantity possessed to 10E10 times the applicable quantity specified in 10 CFR 30, Appendix B, for that radionuclide. The sum of the ratios for all radionuclides possessed under the license shall not exceed unity.
  - B. Notwithstanding the authorizations in items 8, 9, and 10 of this permit, the permittee will further limit the unsealed radioactive materials possessed under this permit to those isotopes with half lives less than 120 days.
- 17. The permittee shall notify AFMSA/SG3PB within 30 days of the termination of a "Notice of Claimed Investigational Exemption for a New Drug (IND)" for any material authorized by this permit.
- 18. The permittee shall not acquire permitted material in a sealed source or device unless the source or device has been registered with the U.S. Nuclear Regulatory Commission pursuant to 10 CFR 32.210 or equivalent regulations of an Agreement State.
- 19. Specific calibration, transmission, and reference sources covered under 10 CFR 35.65 do not need to be listed in item #8.
- 20. Sealed sources containing permitted material shall not be opened or removed from devices by the permittee.
- 21. A. (1) Each sealed source acquired from another person and containing permitted material, other than Hydrogen-3, with a half-life greater than 30 days and in any form other than gas shall be tested for contamination and/or leakage before use. In the absence of a certificate from a transferor indicating that a test has been made within 6 months before the transfer, a sealed source received from another person shall not be put into use until tested.
  - (2) Notwithstanding the periodic leak test required by this condition, any permitted sealed source is exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.
  - (3) Except for alpha sources, the periodic leak test required by this condition does not apply to sealed sources that are stored and not being used. The sources excepted from this test shall be tested for leakage prior to any use or transfer to another person unless they have been leak tested within 6 months before the date of use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and or concentration.
  - B. Each sended source containing permitted material, other than Hydrogen-3, with a half-life greater than 30 days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed 6 months except that each source designed for the purpose of emitting alpha particles shall be tested at intervals not to exceed 3 months.
  - C. Test sample(s) shall be collected by the permittee and forwarded to the USAFSAM/OEIIII, 2350 Gillingham Dr. Brooks-City Base TX 78235-5103, or to any individual authorized by USNRC or Agreement State license or USAF or USN permit to evaluate leak tests for others.
  - D. The leak test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. The test sample shall be taken from the scaled source or from the surfaces of the device for which the scaled source is permanently or semipermanently mounted or stored on which one might expect contamination to accumulate. Records of leak test results shall be kept in units of microcuries and maintained for a period of 3 years for inspection by the NRC, the USAF Radioisotope Committee Scaretariat, or the Medical Directorate of the Air Force Inspection Agency.
  - E. If the test required by Subsection A. or B. of this condition reveals the presence of 0.005 microcorie or more of temovable contamination, the permittee shall immediately withdraw the sealed source from use and store, dispose, or cause it to be repaired in accordance with NRC regulations and Air Force directives. A report shall be filed within 5 days of the test with the USAF Radioisotope Committee Secretariat (AFMSA SG3PB, 1400 Key Blvd, Nash Bldg, Ste #400, Rosslyn, VA 22209-1554) describing the equipment involved, the test results, and the corrective action taken.

# RADIOACTIVE MATERIAL PERMIT USAF RADIOISOTOPE COMMITTEE SUPPLEMENTARY

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- 22. The permittee shall conduct a physical inventory every 6 months to account for all sealed sources received and possessed under this permit. The records of the inventories shall be maintained for 3 years from the date of the inventory and made available for inspection by the NRC, the USAF Radiosotope Committee Secretariat, or the Medical Directorate of the Air Force Inspection Agency, and shall include: a) inventory date, b) model and serial number of device or source, c) radionaclide and activity, d) device or source location, and e) signature of the permit RSO certifying the inventory accuracy.
- 23. The permittee may hold any radioactive material authorized by this permit with a physical half-life of less than or equal to 120 days for decay-in-storage before disposal without regard to its radioactivity (10 CFR 35.92(a)), provided:
  - A. Before disposal, the waste shall be surveyed at the container surface with the appropriate survey instrument set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be obliterated or removed.
  - B. A record of each such disposal permitted under this permit condition shall be retained for three years. The record must include the date of disposal, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.
- 24. The permittee may transport permitted material in accordance with the provisions of 10 CFR 71, "Packaging of Radioactive Material for Transport" and 49 CFR 170 through 189, "Transportation" subject to any host nation restrictions under Status of Forces Agreements.
- Transfer of permitted material may only be to an authorized receipient as described in 10 CFR 30.41 and in accordance with AFI 40-201.
- 26. The permittee shall ensure that a qualified Air Force or civilian medical physicist conducts a medical physics assistance visit at intervals not to exceed 24 months. A copy of the assistance visit report will be forwarded to the USAF Radioisotope Committee Secretariat within 30 days of report publication.
- 27. Except as specifically provided otherwise by this permit, the possession and use of radioactive material described in item #8 of the permit shall be in accordance with statements, representation, and procedures contained in the following documents:

DOCUMENT	SUBJECT	DATE
3 MDSS/SGSARN (Application)	Renewal Application for Material Permit	10-Jun-2002
3 MDSS/SGSARN (Memo)	Amendment Request, Permit 50-01810/18AFP, Docket No. 030-22254	15-Jul-2002
3 MDSS/SGSARN (Memo)	Amendment Request, Change RSOs	09-Oct-2002
3 MDSS/SGSARN (Memo)	Amendment Request, Permit 50-01810/19AFP, Docket No. 030-22254	03-Dec-2002
3 MDSS/SGSARN (Memo)	Amendment Request, Permit 50-01810/20AFP, Docket No. 030-22254	08-Apr-2003
3 MDSS/SGSARN (Memo)	Amendment Request, Permit 50-01810/21AFP, Docket No. 030-22254	08-Oct-2003
3 MDSS/SGSARN (Memo)	Renewal Application Deficiency, Alt RSO Appointment	05-Jan-2004
3 MDSS/SGSARN (Memo)	Appointment of Alt RSO	03-May-2004
3 MDSS/SGSARN (Memo)	Permit Amendment	17-May-2004
3 MDSS/SGSARN (Memo)	Amendment Request - Change RSOs	05-May-2005
(Permit)	Pennit Document	01-Jul-2005
3 MDSS/SGSARN (Memo)	Amendment Request - Add Authorized User	14-Oct-2005
3 MDSS/SGSARN (Memo)	Amendment Request - Remove/Add AUs and RSOs	25-Jul-2006
3 MDSS/SGSX (email w/ Atch)	Amendment Request - Add AU (Reed); combine and/or remove authorized use areas	21-Dec-2007

# RADIOACTIVE MATERIAL PERMIT USAF RADIOISOTOPE COMMITTEE SUPPLEMENTARY

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3 MDOS/SGOXN (entail w/Atch)

Amendment Request - Remove AU; Note: AFMSA/SG3PB

25-Aug-2008

performed a permit docket review; permit conditions were revised and an inappropriate (historic) docket reference was removed (01-Jul-2005), reference previous permit amendment.

3 MDOS/SGOXN (Memo w-o Arch)

3 MDOS/SGOXN (Memo w/ Atch)

Amendment - Change in Permittee (MDSS/CC to MDOS/CC)

01-Dec-2008

Amendment Request - Add APRSO (McClain)

05-Jan-2009

The Nuclear Regulatory Commission's regulations and United States Air Force directives shall govern the permittee's statements in applications or letters, unless the statements are more restrictive than the regulations and directives

Date

FOR THE USAF RADIOISOTOPE COMMITTEE:

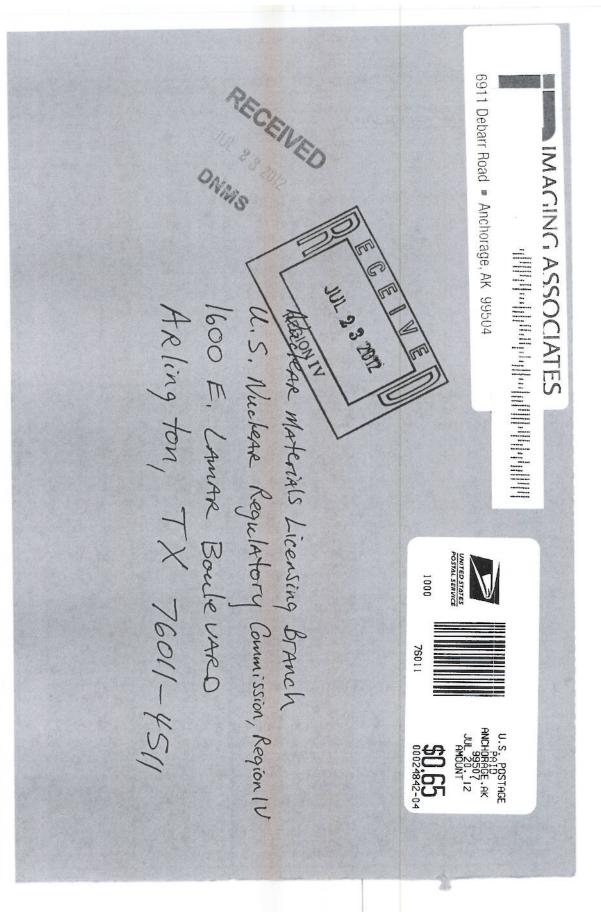
a February 2007

By Mobert A. Moc G. S. Maj, USAF, BSC

Chief, Radiation Program Operations

Deputy Chief, USAF Radioisotope Committee Secretariat

Air Force Medical Support Agency Office of the Surgeon General



NRC FORM 532 (1-2012)	U. S. NUCLEAR REGULATORY COMMISSION  DATE  07/23/2012
NAME AND ADDRESS OF APPLICANT AND/OR LICENSEE  Imaging Associates of Providence, LLC ATTN: Robert L. Bridges, M.D. Radiation Safety Officer 3701 E. Tudor Road Anchorage, Alaska 99507	LICENSE NUMBER 50-27730-01  MAIL CONTROL NUMBER 577916  LICENSING AND/OR TECHNICAL REVIEWER ch
above. Your application is deemed timely file final action has been taken by this office.  Your application for a new NRC license did n Please fill out NRC Form 531, located at the	nistrative review, has been performed.  NEW LICENSE RENEWAL  Itified during our initial review.  Pation for renewal of the material(s) license identified ed, and accordingly, the license will not expire until ot include your taxpayer identification number.
A copy of your action has been emailed to out our Headquarters office in Rockville, MD. Your application has been assigned the above calling to inquire about this action, please refused been forwarded to a technical reviewer. Pleasonmally completed within 180 days for a rem	fer to this control number. Your application has ase note that the technical review, which is newal application (90 days for all other requests), additional information. If you have any questions in, our contact information is listed below:  Commission  d

1/2/23

# [FOR ARPB USE] BETWEEN: INFORMATION FROM LTS Accounts Receivable/Payable Program Code: 02200 and Status Code: Pending Amendment Regional Licensing Branches Fee Category: 7C Exp. Date: Fee Comments: Decom Fin Assur Reqd: License Fee Worksheet - License Fee Transmittal A. REGION 1. APPLICATION ATTACHED IMAGING Associates of Providence, LLC Applicant/Licensee: Received Date: 07/23/2012 3035999 Docket Number: 577916 Mail Control Number: 50-27730-01 License Number: Amendment Action Type: 2. FEE ATTACHED Amount: Check No .: 3. COMMENTS Signed: Date: B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / / 1. Fee Category and Amount: 2. Correct Fee Paid. Application may be processed for: Amendment: Renewal: License: 3. OTHER Signed:

Date: