



DEPARTMENT OF RADIOLOGY  
*Henry Ford Hospital & Health Network*

**Radiation Safety Office**

February 6, 2013

Henry Ford Hospital  
2799 West Grand Blvd.  
Detroit, Michigan 48202-2689  
(313) 916-7042 Office  
(313) 916-8456 Fax

Materials Licensing Branch  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

Dear Sir or Madam:

I am requesting an amendment to license No. 21-11850-01 for Henry Ford Macomb Hospital's license (Docket 030-02106). This amendment request is being made to establish myself, Alan M. Jackson, MS, CHP, as the Radiation Safety Officer. I will refer to myself in the third person for the remainder of this letter. A completed NRC attestation form 313A(RSO) for Mr. Jackson is attached.

Mr. Jackson has been a radiation safety professional since he obtained a Masters Degree in Radiological Health Physics in May of 1989. While it has been more than 7 years since his initial training, Mr. Jackson has maintained the timeliness of his training by staying current in the field of medical health physics. As you certainly know, NRC does not ordinarily permit listing more than one Radiation Safety Officer on a license and thereby Mr. Jackson has not been able to get his training and experience previously approved as a medical RSO. Mr. Jackson has been employed continuously in the field of Health Physics since his initial training. Mr. Jackson worked in Radiation Safety at the Veterans Administration Hospital in Ann Arbor during his graduate education (NRC License 03-23853-01VA; VHA Permit Number 21-00159-04). After his graduation Mr. Jackson worked in radiation safety at the University of Virginia (NRC license Number 45-00034-26 – now VA 540-248-1; R-66; and R-123). Mr. Jackson then joined the radiation safety group at the University of Michigan (21-00215-04; R-28). Mr. Jackson briefly served as an industrial sealed source RSO for DSC (Trenton MI). Mr. Jackson then joined Henry Ford Health System (21-04109-16; 21-12930-01; 21-32288-01; 21-04082-01). Mr. Jackson is the Trustworthy and Reliability Official for Henry Ford Health System (license 21-04109-16).

It is relevant to note that Mr. Jackson is one of the faculty listed in a Commission on Accreditation of Medical Physics Educational Programs (CAMPEP) accredited imaging program. Mr. Jackson also teaches radiology residents. Mr. Jackson teaches radiological protection, radiation biology, radiation regulations, instrumentation, and other medical health physics topics to physicians and diagnostic physics residents. In fact, Mr. Jackson's instruction helps physicians and medical physicists to become Authorized Users or Authorized Medical Physicists (thereby qualifying them to become an RSO themselves).

Mr. Jackson achieved certification in the comprehensive practice of Health Physics through the American Board of Health Physics in November 1994. Unfortunately, Mr. Jackson's ABHP certification is not recognized by NRC as the date in which his certification was achieved was prior to a rewrite of 10 CFR 35 and NRC does not list his certification date on the NRC website. Nonetheless, Mr. Jackson's maintenance of certification is additional evidence of his recentness of training and experience. Mr. Jackson is currently recertified through 2014.

Another indication of Mr. Jackson's recentness of training is evidenced by the recognition given to him by his peers in radiation protection. It is notable that Mr. Jackson was President of Medical Health Physics Section of the Health Physics Society in 2010. Mr. Jackson has also served on the Radiation Protection Subcommittee of the AAPM for several years. Mr. Jackson has been President of the Great Lakes Chapter of the Health Physics Society five times. Mr. Jackson was also a board member of the RSO section of the HPS.

While Mr. Jackson has been employed principally in Medical Health Physics since being hired at Henry Ford Health System in July of 1998, he has an tremendously varied experience in health physics including prior employment experience as a research reactor health physicist, experience with teletherapy equipment (10 CFR 35.600 use), gamma knife experience, large panoramic irradiator experience, material gauging equipment, biomedical research, radiochemistry, 14 MeV neutron generators safety, PET and cyclotron protection, radiopharmaceutical production, radioactive material protection, neutron activation analysis, environmental measurements, environmental modeling, emergency response, increased controls security, special nuclear material use, hot cell work, criticality protection, radioactive waste disposal, external dosimetry testing, internal dosimetry assessment, approval of investigational human use, radiation equipment output measurements, quality management, etc.

### **License Changes**

Upon approval of Mr. Jackson's training and experience for the RSO position we would like for him to replace Khuran Rashid, M.D. as the RSO but please note

that Dr. Rashid will continue as an authorized user on this license. A "Delegation of Authority" document signed by a member of our administration is attached.

Please also delete Flavious Martin as an Authorized Medical Physicist as he is retired.

**Discussion**

Mr. Jackson has submitted countless requests to the NRC over his 25 years of health physics experience. His track record in health physics is evident in a review of ADAMS. If you should have any questions regarding this request, please feel free to contact Alan Jackson, MS, CHP at (313) 916-2739. We hope to make this transition by April 1, 2013.

Sincerely,



Alan M. Jackson, MS, CHP

cc: Radiation Safety Committee

Filename: NRC Add Alan Jackson as RSO to Macomb 1-13



**Robert G. Riney**  
President & Chief Operating Officer

Executive Offices  
1 Ford Place, 5B  
Dearborn, MI 48202-3450  
(313) 876-3707 Office  
(313) 876-9269 Fax  
riney@hfhs.org

*Henry Ford Medical Group*

*Henry Ford Hospital  
& Health Network*  
Henry Ford Hospital  
Henry Ford Behavioral Health Services  
Maple Grove Center  
Kingswood Hospital  
Henry Ford Cottage Hospital  
Henry Ford Medical Centers

*Henry Ford Macomb Hospitals*  
Eaton Township Campus  
Mt. Clemens Campus  
Warren Campus  
Henry Ford Macomb Health Centers

*Henry Ford West Bloomfield Hospital*

*Henry Ford Wyandotte Hospital*  
Center for Health Services

*Henry Ford Physician Network*

*Health Alliance Plan*  
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Henry Ford at Home  
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*Centers of Excellence*  
Heart & Vascular Institute  
Josephine Ford Cancer Center  
Neuroscience Institute  
Transplant Institute  
Vatakuu Urology Institute

[henryford.com](http://henryford.com)

February 6, 2013

To Whom It May Concern:

Re: Delegation of Radiation Safety Authority for Macomb Hospital

The Radiation Safety Office is granted the authority, organizational freedom, and management prerogative to carry out the responsibilities described below.

Alan Jackson, MS, CHP, has been appointed Radiation Safety Officer and is responsible for ensuring the safe use of radiation at Henry Ford Macomb Hospital. The Radiation Safety Officer is responsible for managing the radiation safety program which includes: identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations. The Radiation Safety Officer is hereby delegated the authority necessary to meet those responsibilities including the authority to immediately stop any operations involving the use of ionizing radiation in which either health and safety may be compromised or which may result in non-compliance with regulatory or other legal requirements. The Radiation Safety Officer is empowered to contact regulatory agencies without any pre-approval.

In addition, Donald J. Peck, PhD has been appointed to act as an alternate in the absence of Mr. Jackson.

Robert G. Riney  
President & Chief Operating Officer

NRC FORM 313A (RSO)  
(05-2012)

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: (05/31/2015)

Name of Proposed Radiation Safety Officer

Alan M. Jackson, MS CHP

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	University of Michigan, BS, MS Ann Arbor MI LSA, Radiological Health Program Rackham	286	9/1980 - 5/1988
Radiation protection	University of Michigan, Master Science Degree Radiological Health Program Ann Arbor MI	156	9/1987 - 5/1988
Mathematics pertaining to the use and measurement of radioactivity	University of Michigan, BS, MS Ann Arbor MI LSA, Radiological Health Program Rackham	78	9/1980 - 5/1988
Radiation biology	University of Michigan, Master Science Degree Radiological Health Program Ann Arbor MI	39	9/1987 - 5/1988
Radiation dosimetry	University of Michigan, Master Science Degree Radiological Health Program Ann Arbor MI	117	9/1987 - 5/1988

**Total Hours of Training:** 676

**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	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Using and performing checks for proper operation of instruments used to determine the activity of dosages, survey meters, and instruments used to measure radionuclides	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Securing and controlling byproduct material	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Using administrative controls to avoid mistakes in administration of byproduct material	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Using procedures to prevent or minimize radioactive contamination and using proper decontamination procedures	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Using emergency procedures to control byproduct material	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Disposing of byproduct material	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Licensed Material Used (e.g., 35.100, 35.200, etc.)+  35.100, 35.200, 35.300, 35.400, 35.500, 35.600, 35.1000	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present

\* 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).

**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 Donald Peck, Ph.D. DABR	License/Permit Number listing supervising individual as a Radiation Safety Officer Multiple including 21-0419-16
This license authorizes the following medical uses:	
<input checked="" type="checkbox"/> 35.100	<input checked="" type="checkbox"/> 35.200
<input checked="" type="checkbox"/> 35.300	<input checked="" type="checkbox"/> 35.400
<input checked="" type="checkbox"/> 35.500	<input checked="" type="checkbox"/> 35.600 (remote afterloader)
<input checked="" type="checkbox"/> 35.600 (gamma stereotactic radiosurgery)	<input type="checkbox"/> 35.600 (teletherapy)
	<input checked="" type="checkbox"/> 35.1000 (Y-90, I-125, etc. )

**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	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Radiation safety, regulatory issues, and emergency procedures for 35.300 uses	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Radiation safety, regulatory issues, and emergency procedures for 35.400 uses	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Radiation safety, regulatory issues, and emergency procedures for 35.600 - teletherapy uses	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Radiation safety, regulatory issues, and emergency procedures for 35.600 - remote afterloader uses	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Radiation safety, regulatory issues, and emergency procedures for 35.600 - gamma stereotactic radiosurgery uses	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present
Radiation safety, regulatory issues, and emergency procedures for 35.1000, specify use(s):	Multiple: Ann Arbor VA Hospital, University of Michigan, University of Virginia, Henry Ford Health System (example license 21-0419-16)	1989-Present

**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.)*

Donald Peck, PhD, DABR

License/Permit Number listing supervising individual

Multiple: 21-04109-16

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 (Y-90, I-125, Cs-137 )

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 Alan M. Jackson 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**



**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 \_\_\_\_\_ 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 Alan M. Jackson 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:

Y-90 Microspheres, intravascular brachytherapy, Ra-223, Cs-137, etc.

NRC FORM 313A (RSO)  
(05-2012)

U.S. NUCLEAR REGULATORY COMMISSION

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

**AND**

**Third Section  
Complete for ALL**


I attest that Alan M. Jackson 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 Multiple, including Henry Ford Hospital  
Name of Facility

License/Permit Number: Multiple including NRC 21-0419-16

Name of Preceptor Donald Peck, Ph.D., DABR	Signature 	Telephone Number (313) 916-3344	Date 01/17/2013
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Radiology  
2799 West Grand Boulevard  
Detroit, Mi. 48202  
Radiation Safety Office # (313) 916-7042  
Radiation Safety Fax # (313) 916-8456

**Henry Ford Hospital  
Henry Ford Medical Group**

# Facsimile Transmittal

<b>To:</b> Karen - Materials Licensing	<b>Facility:</b> NRC Region III
<b>Phone:</b> (800)522-3025 or (630)829-9887	<b>Fax:</b> (630)515-1078
<b>From:</b> Alan M. Jackson	<b>Dept:</b> Radiation Safety Office
<b>Phone:</b> (313) 916-2739	<b>Fax:</b> (313) 916-7329
<b>Pages:</b> 11 (including cover)	<b>Date:</b> February 6, 2013

**Urgent**     
 **For Review**     
 **Per your request**     
 **Please Reply**

**• Comments:**

Please see the attached request to name Alan M. Jackson as the Radiation Safety Officer for Henry Ford Macomb Hospital (License: 21-11850-01; Docket: 030-02106).

We hope that this request can be completed by April 1, 2013.

**\*\* Confidentiality Notice \*\***

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