




THE GEORGE WASHINGTON
UNIVERSITY HOSPITAL

From: Kimberly Russo 
COO The George Washington University Hospital

To: Lester Tripp
USNRC Region 1

Re: Request for Information in Support of Amendment Request to Change RSO
License No. 08-30607-01
Control No. 582371

Date: November 27, 2013

Dear Mr. Tripp:

Please see the below the additional information you requested for in reference to our application to authorize Arnold Able as Radiation Safety Officer for George Washington University Hospital:

- a. Describe the control over the radiation safety program that will be delegated so that the consultant-RSO will be able to exercise authority over authorized users when confronted with radiation safety problems that require implementation of corrective actions.

The Senior Administration at GWUH recognizes that the RSO position must have an adequate assignment of autonomy and authority to act on behalf of the institution, regardless of the employment mechanism (contracted or employed). As such the authority is delegated to the position. The individual serving in the capacity of RSO is afforded written confirmation from Senior Administration that their responsibility to this position is to enforce compliance with the established Radiation Safety Program directly with hospital staff and authorized users. We recognize that authorized users (typically physicians) are afforded special status; however, it is emphasized that the hospital is the licensee, and that authorized users on this license are privileged users subject to the authority of the RSO to monitor activities, and if deemed necessary, suspend or terminate activities that are (radiation) unsafe. Such actions (compliance, suspension, termination) will occur with full knowledge and support of Senior Administration.

- b. Describe the relationship that will exist between the consultant-RSO and your institutional management regarding expenditure of funds to facilitate the objectives of your radiation safety program and related regulatory requirements.

The RSO position falls under the budgetary control of the Department of Radiology, which is managed by and under financial responsibility of the Division Director of Radiological Operations. The RSO and the Director will collaborate annually for development of a budget sufficient to meet the needs of the Radiation Safety Program, including operational and capital funds. Operational funds will be budgeted for usual and routine license maintenance costs (fees, renewals, etc.), for

educational materials and support, for on-going inspections, for special audits, for personnel dosimetry, radioactive material disposal, etc., in support of the on-going program. In addition, the Director and the RSO will collaborate on capital budget items that may be needed to sustain and improve the Radiation Safety Program, for example, additional survey instrumentation, special dosimetry measurement applications (e.g., emergency preparedness), exit portal monitors, special shielding applications (e.g., rolling shields), radionuclide calibrators, etc. GWUH is an institution in strong financial health that will support the office of the RSO.

- c. Identify other commitments of the consultant-RSO for other NRC or Agreement State licensed facilities, along with a description of how the consultant-RSO will allocate time to permit the performance of the duties of the RSO as described in the regulations. State the consultant-RSO's minimum amount of on-site time (hours per week).

The requested designee to serve as the RSO, Mr. Able, is well known in the local medical physics and radiation safety community and to our Radiology Department. He and his medical physics associates have supported GWUH for many years as the source of qualified medical physics for all radiation machines. In addition, Mr. Able also serves as RSO for two other institutions in the local community, Inova Loudoun Hospital in Virginia (license number RML 107-129-1) and Lifebridge Health Sinai Hospital in Maryland (license number MD-07-011-01), successfully managing those Radiation Safety Programs for many years. His breadth of experience and knowledge of regulations reflects three decades of service to the local hospital community. The successful management of the GWUH hospital Radiation Safety Program will be made viable through the direction of a staff of medical physicists who are directly involved in GW radioactive materials licensed activities inclusive of the operation and accreditation of both nuclear imaging devices and x-ray imaging devices. Since the departure of our previous RSO, surveys and procedures have been conducted by these medical physicists while under supervision of the temporary RSO designee. The time commitment of the RSO and his associates estimated to support the Radiation Safety Program is approximately 0.5 FTE (about 20 hrs/week). Senior Administration has allocated clerical support and adequate office space to the Radiation Safety Program. In addition, the administration is committed to address and review annually the time requirement needs of the Hospital with the Director to assure that the Radiation Safety Program is well-managed and operated.

- d. Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant-RSO with limited authority.

The appointed in-house representative will be the Division Director of Radiological Operations.

- e. Describe the overall availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements. Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.

Mr. Able maintains an office in suburban Maryland and has all modern contact mechanisms available, including an office staff, phone (business and home), email, and texting capabilities. Response time is addressed in the contract initiatives as within 0.5 hours during normal working hours and 1 hour outside of normal working hours. In case of emergent circumstances requiring physical presence, the normal maximum response time can be expected to be 1 hour.

GWUH Senior Administration understands that, as the licensee, the hospital bears all responsibility for compliance and that this responsibility is not transferred to the Authorized Users nor the RSO (consultant or employee). We believe we have established a mutually beneficial partnership agreement with Associates in Medical Physics, LLC to provide qualified medical physics services and a qualified individual to serve as our RSO.