

Licensee: Central Vermont Medical Center

License No.: 44-13353-01

Docket No.: 030-03292

Mail Control: 582352

Date: <sup>December</sup>~~January~~ 17, 2013

Dear Ms. Abogunde:

Provided below is the information requested via email correspondence dated December 16, 2013 regarding our request to name Marleen M Moore, M.S. as the RSO for Central Vermont Medical Center's radioactive materials license.

Before providing specific answers, let me provide a clarification of the agreement between Central Vermont Medical Center and Fletcher Allen Health Care (FAHC), both members of Fletcher Allen Partners, and also describe future plans. This appointment is under a contract between Fletcher Allen Health Care and Central Vermont Medical Center for FAHC to provide Medical Physics services, both for RSO and Radiation Oncology requirements. Currently, the medical physicists from FAHC, all of whom are on the license as Authorized Medical Physicists, provide physics coverage on site two days per week. The intent is to hire another medical physicist who will be on site up to four days per week and who will be able to serve as Radiation Safety Officer. Until this transition occurs, Ms. Moore has agreed to act as RSO.

1. *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.*

CVMC commits to supporting Ms. Moore as RSO and delegate to her the authority to implement any necessary corrective actions.

2. *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.*

CVMC commits to providing the necessary funds to support the radiation safety program.

3. *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 or month).*

Ms. Moore is the RSO on the Fletcher Allen Health Care radioactive materials license (NRC # 44-10187-03). As noted, this appointment is under a contract between Fletcher Allen Health Care and Central Vermont Medical Center for FAHC to provide Medical Physics services. As part of that contract, FAHC will allow necessary time for Ms. Moore to be present at CVMC, with a minimum of one day per month to review activities. Also note that the physicists who provide the on-site coverage in Radiation Oncology are well qualified to address any immediate radiation safety concerns.

- 4. 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.*

Anthony Fecteau, a senior Nuclear Medicine technologist employed by CVMC is able to manage any issues that may arise. Note that the prostate implant program, which is the other area of use, will be temporarily suspended until greater on-site coverage is in place.

- 5. 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.*

Ms. Moore is available by telephone, including paging through the hospital central system, at all times. The low risk associated with both 35.100 and 35.200 use is such that it is unlikely that an emergency that would present a high risk to personnel or the public would occur. Low risk situations are likely able to be addressed through telephone contact. If necessary, the RSO or appropriate designate could be at CVMC within an hour.

Please feel free to contact me with further questions you may have. My email address is: [Nancy.Lothian@cvmc.org](mailto:Nancy.Lothian@cvmc.org). My telephone number is 802-371-4311. Thank you.

Sincerely,



Nancy R. Lothian, MBA  
Chief Operating Officer  
Chief Compliance Officer  
Central Vermont Medical Center

Cc: Marleen Moore, FAHC Physics Department  
Dixie Mercier, Director, Diagnostic Imaging  
Trisha Hunt, Director, Radiation Oncology