

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

JAN 10 2014



Nick Lannutti, M.S.
Radiation Safety Officer
Mercy Hospital Springfield
1235 East Cherokee Street
Springfield, MO 65804

Dear Mr. Lannutti:

Enclosed is Amendment No. 84 to your NRC Material License No. 24-00866-02 in accordance with your request. Please note that the major 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.

- A. This also refers to your letter dated November 27, 2013, which requests authorization for Neelu Soni, M.S. as an Authorized Medical Physicist (AMP) for high dose rate remote afterloading brachytherapy (HDR).

We were unable to approve Ms. Soni at this time because the information provided in your letter dated November 27, 2013, was insufficient to complete our review.

If you wish to pursue this matter, please provide one complete, written response that is currently dated and signed by a senior management official for your license, addressed to my attention at the above address, as "additional information to control number 582477." We will then continue our review.

Ms. Soni's request to become an AMP for HDR must be supported by the description of her education, training and experience on her Forms NRC 313a (AMP), as attested to by a qualified authorized user/preceptor for the same modality. A key part of this supporting documentation consists of verification of his preceptor, E. Ishmael Parsai, Ph.D.

Her Forms 313a (AMP) were signed on October 3, 2012, by Dr. Parsai, representing The University of Toledo, license number 02110490006, which is an Agreement State licensee.

NRC does not have direct jurisdiction over this licensee. The state of Ohio does and it

The enclosed document contains sensitive security-related information.
When separated from this cover letter this letter is uncontrolled.

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administers this license. NRC does not have access to this license, which is needed to assist in the verification of the preceptor, Dr. Parsai, as an AMP. The copy of this license provided only shows that Dr. Parsai is listed as the Radiation Safety Officer (RSO), which is a credential that does not qualify someone as an AMP.

If this license is a broad scope medical license, as it appears to be, then Dr. Parsai's name does not appear on the license itself, as the license doesn't list specific authorized users, AMP's, etc., by name. The Radiation Safety Committee for broad scope medical licenses normally evaluates and approves/disapproves of authorized users, and AMP's, internally, and maintains records of them.

Please submit a signed, dated letter from the Chairperson of the University of Toledo's Radiation Safety Committee attesting that Dr. Parsai was an AMP for HDR uses during the timeframe when he supervised and preceptored Ms. Soni.

Please refer to the regulatory requirements in 10 CFR 35.13(b)(4)(i) and (ii); 10 CFR 35.14(a); and section 8.12, item 7 and Appendix D in NUREG 1556, Vol. 9, Rev. 2, for assistance in preparing your written response to demonstrate that Dr. Parsai is qualified to serve as preceptor. Sections I and V. in Appendix D reference the information we are requesting.

Please do not submit resumes, CV's, or personal, proprietary information that we must protect, in accordance with 10 CFR 2.390, such as social security numbers, dates of birth, home addresses or phone numbers, patient records, college transcripts, etc.

Please do not resubmit any documents you have already submitted.

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."

B. In this amendment we also deleted Condition No. 19, as it appeared on Amendment No. 83, because it was no longer necessary for your license. Please note that the Conditions numbered after it have been re-numbered.

If you have any questions or comments concerning this amendment, please contact me at (630) 829-9841. My email address is colleen.casey@nrc.gov. My fax number is (630) 515-1078.

NRC's Regulatory Issue Summary (RIS) 2005-31 provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through ADAMS, the NRC's electronic document system.

Pursuant to NRC's RIS 2005-31 and in accordance with 10 CFR 2.390, the enclosed license document is exempt from public disclosure because its disclosure to unauthorized individuals could present a security vulnerability.

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The RIS may be located on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/ri200531.pdf> and the link for frequently asked questions regarding protection of security related sensitive information may be located at: <http://www.nrc.gov/reading-rm/sensitive-info/faq.html>.

A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

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. 24-00866-02
Docket No. 030-02285

Enclosure:

Amendment No. 84